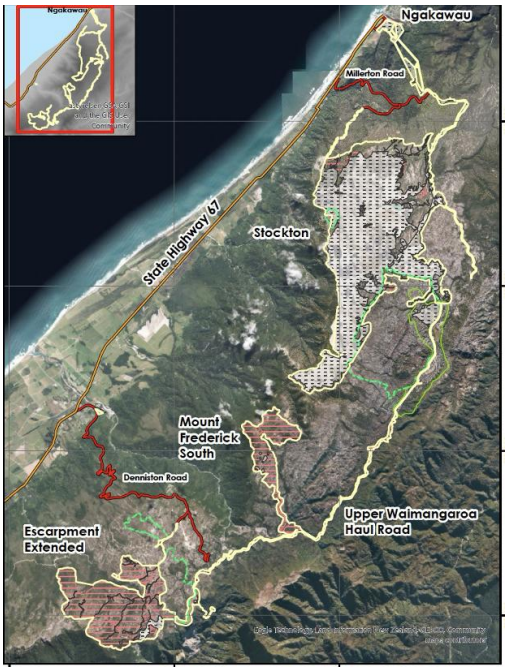
BULLER PLATEAUX CONTINUATION PROJECT, WESTPORT, SOUTH ISLAND: ARCHAEOLOGICAL AND HISTORIC HERITAGE ASSESSMENT (PART 5 – DISCUSSION AND CONCLUSIONS)

Prepared for Bathurst Resources Ltd

May 2026



By

Kim Tatton, MA (Hons)
Doug Gaylard, MA (Hons)
Rod Clough, PhD (London)

Clough & ASSOCIATES LTD

www.clough.co.nz

TABLE OF CONTENTS

INTRODUCTION

Project Background

Bathurst Resources Ltd (including subsidiary companies, Bathurst Coal Ltd, and Buller Coal Ltd) and joint venture partner BT Mining Ltd (collectively referred to as Bathurst) is seeking authorisation through the Fast-track Approvals Act 2024 (FTAA) to progress the development and mining of coal resources across the wider Buller Plateaux, known as the Buller Plateaux Continuation Project (the Project or BPCP).

The Project covers areas across both the Denniston Plateau and Stockton Plateau, collectively referred to as the Buller Plateaux, located approximately 15 km northeast of Westport on the West Coast of the South Island (Figure 1). The land ownership is a mix of Bathurst, Crown, Buller District Council and privately owned land with existing approvals for the current mining operations across several areas of the Project footprint (Figure 2).

The Project covers five Project sub-areas: Stockton (including the Ngākawau Coal Handling Facility and Aerial Ropeway); Mount Frederick South; Escarpment Extended; the Upper Waimangaroa Haul Road; and Cypress (**Error! Reference source not found.**).[1]

Due to the large amount of information discussed, the BPCP Archaeological and Historic Heritage Assessment has been divided into six parts, which covers each of the Project sub-areas, the Discussion and Conclusions of the BPCP Project and an Appendix report:

Part 1. Escarpment Extended (ESE) Project sub-area;

Part 2. Upper Waimangaroa Haul Road (UWHR) Project sub-area and Denniston pest exclusion fences;

Part 3. Mount Frederick South (MFS) Project sub-area;

Part 4. Stockton Project sub-area and Stockton pest exclusion fences;

Part 5. BPCP Project Discussion and Conclusions;

Appendix: Historical and Archaeological Background of the Denniston and Stockton Plateaux.

This report is Part 5. BPCP Project – Discussion and Conclusions of the Archaeological and Historic Heritage Assessment, commissioned by Bathurst and prepared as part of the required assessment of effects accompanying an application under the FTAA, which includes consideration of the heritage provisions of the District Plan (Resource Management Act (RMA)) and the requirement for Authority to modify various archaeological sites under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). Recommendations are made in accordance with statutory requirements.

[1] Note only continuation of the existing Cypress Mine authorised under existing consents; however Wildlife Act Authorities are required to be renewed, as well as variations to existing conditions to ensure integration with the BPCP.

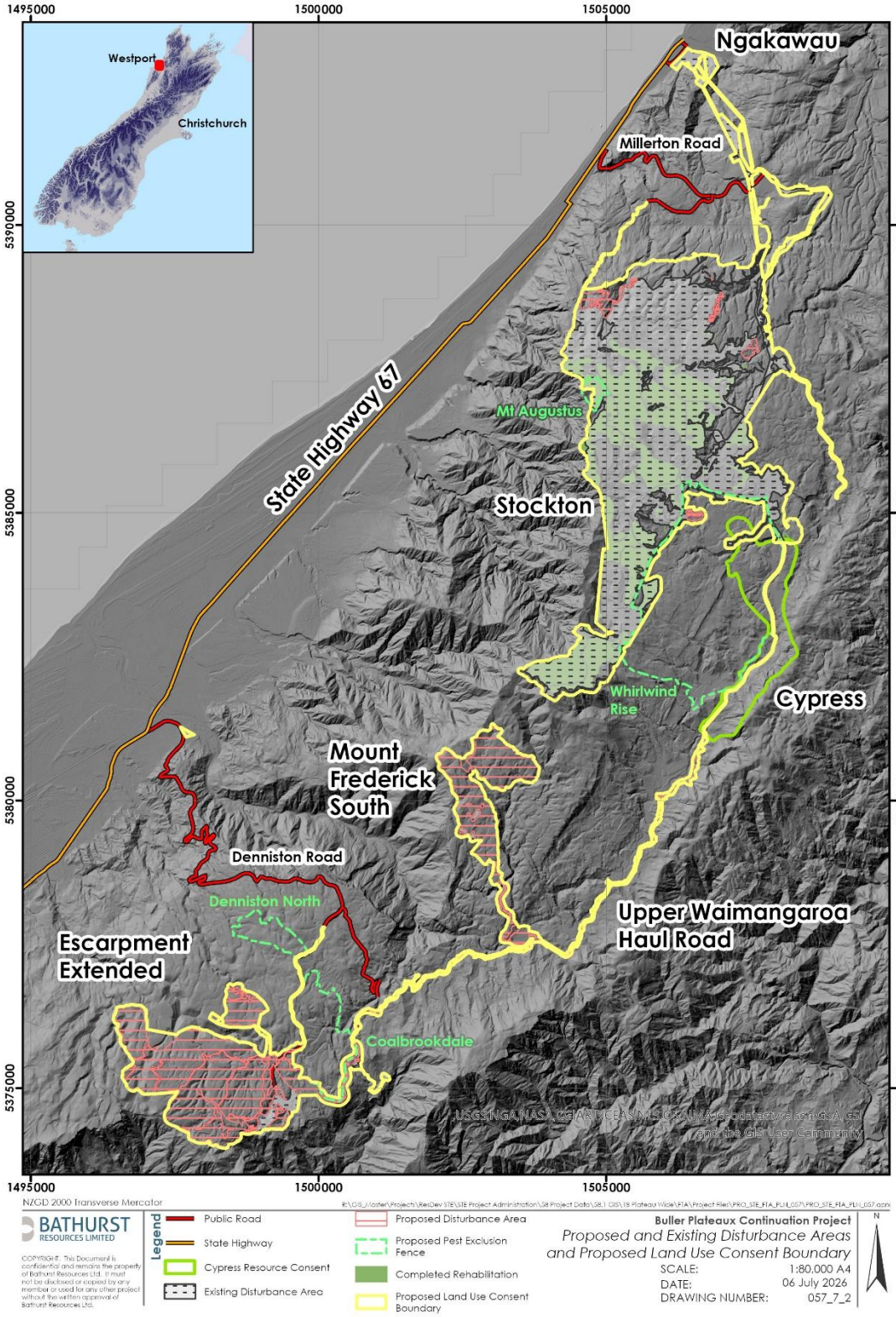


Figure 1. BPCP Project area and the Proposed and Exiting Disturbance Areas and Proposed Land Use Consent Boundary (source: Bathurst)

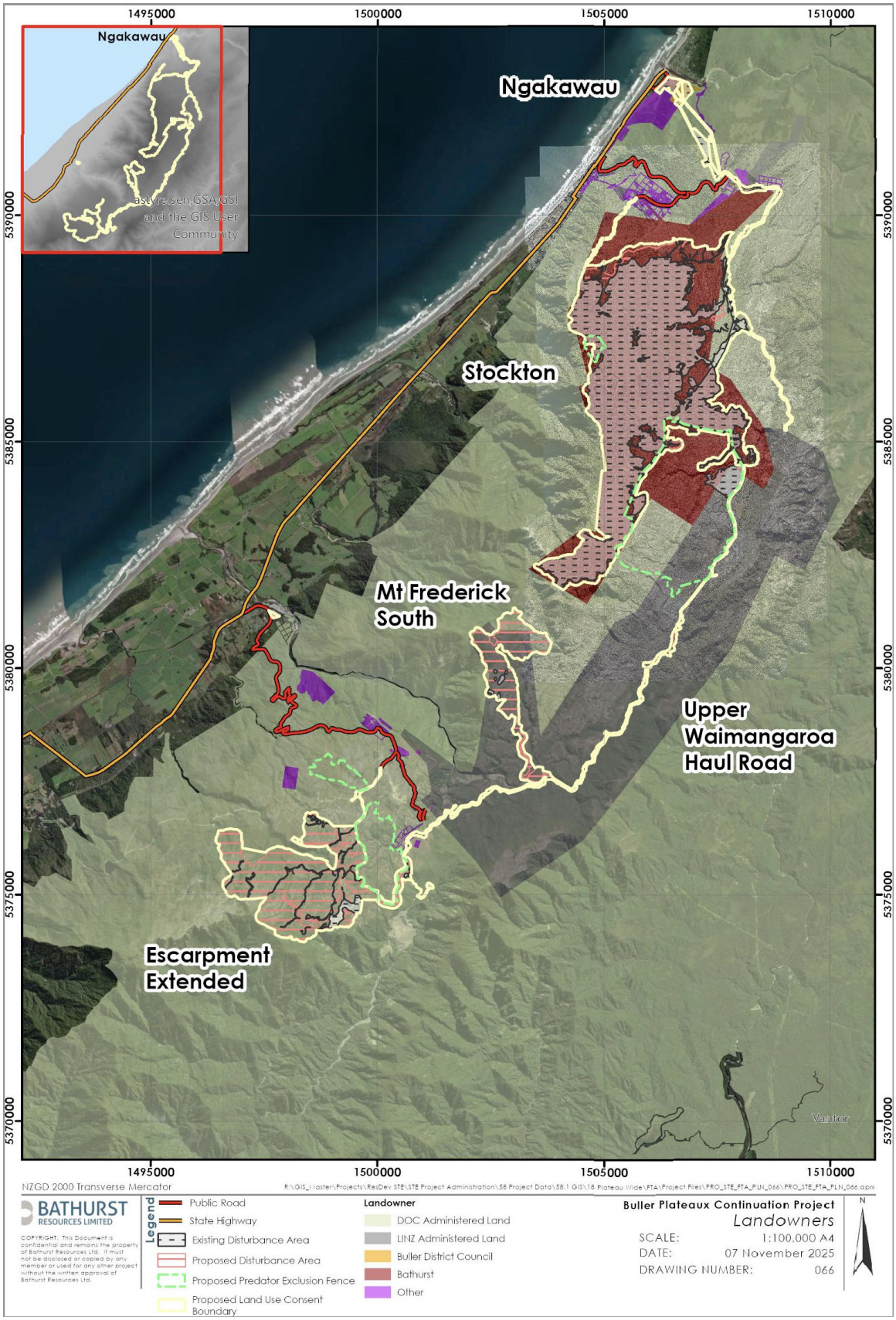


Figure 2. Land ownership across the BPCP (source: Bathurst)

BPCP Project Description

For a detailed description of the Project sub-areas, please refer to the project description within the Assessment of Environmental Effects provided with the application. A project summary of each of the Project sub-areas is also provided in Parts 1-4 of the BPCP Archaeological and Historic Heritage Assessment.

In brief, the Project comprises five Project sub-areas as set out in Table 1. These Project sub-areas and their proposed disturbance areas and consent areas are shown in Figure 1 above.

Table 1. BPCP Project Sub-Areas

Project Sub-Areas	Project Scope within Sub-Area
Stockton (including the Ngakawau Rail Loadout and associated Aerial Ropeway)	Completion of mining of existing pits and remaining coal resources, completion of rehabilitation throughout the site. Ongoing utilisation of existing infrastructure through to closure and then decommissioning.
Upper Waimangaroa Haul Road (**UWHR**)	Road connecting Stockton mine with Mount Frederick South mine and the Escarpment Extended operations. Avoiding the public road network, coal will be transported to the processing facilities at Stockton and then to the existing rail loadout at Ngakawau. The road is a combination of upgrades to existing roads and the development of a new section through the Upper Waimangaroa Valley.
Mount Frederick South (**MFS**)	A new opencast mining area with initial mining through old underground workings, and extension into unmined areas to the northwest along with the extension of the UWHR road into the MFS mine area. Coal will be transported via the UWHR to Stockton.
Escarpment Extended (**ESE**) (including the Waimangaroa storage yard)	Mining is opencast with a combination of an existing opencast pit (Escarpment), old underground workings (Whareatea), and an extension into unworked areas (West Whareatea). Coal will be transported to Stockton via the UWHR.
Cypress	Ongoing mining is authorised under existing consents, the only elements for inclusion in the Project are the renewal of Wildlife Act authorities and a variation to the compensation provisions to integrate with the broader compensation package across the full BPCP.

Table 2 sets out the size of the various sub-areas. All areas quoted are in hectares (ha). For each Project sub-area, Table 2 presents the total consenting footprint which is the sum of:

- Areas that are already disturbed;
- Areas that will be disturbed because of the Project.

Table 2. Disturbance at each BPCP Project sub-area

Sub- Area	Total Consenting Footprint (ha)	Existing Disturbance (up to 31 March 2027) (ha)	Planned Areas of Disturbance (ha)	No Disturbance (ha)
Stockton	1816	1316	31	470
UWHR	88	15	37	37
MFS	216	6	170	41
ESE (including Waimangaroa Storage Area)	587	44	460	84
Total	2708	1380	697	631

DISCUSSION AND CONCLUSIONS

Summary of Heritage Sites

Escarpment Extended (ESE)

The proposed ESE Project sub-area encompasses part of the workings of the Whareatea Mine (K29/72) and the Sullivan Mine (K29/98), which include above ground mining remains and the extensive surviving underground workings. The Whareatea and Sullivan Mines are 20th century underground coal mines, which operated respectively from 1926 to 1988 and 1953 to 1998. Although of recent origin, these recorded coal mines represent two important phases in the Denniston mining history, namely the move onto the Plateau that occurred around the mid-19th century and the development of hydro mining during the last quarter of the century.

The other site within the ESE Project sub-area is the Monocable Aerial Cableway (K29/59) built in 1950-53 to carry coal from the Whareatea, Escarpment and Sullivan Mines to the brakehead bins at Denniston. Remains of the aerial system are scattered over a 3.68km aerial route across the Denniston Plateau.

Other 20th century mining remains include a drill hole and possible building, and two in-situ metal bolts with scattered timbers in the vicinity on a loop track to the west of the Sullivan Mine. Also, nine power poles were recorded along Whareatea Road, which are remnants of a power line that had provided power to either the Whareatea or Escarpment Mine.

It is also likely that other unrecorded 20th century heritage features may be present within or in proximity to the identified earlier mining sites within the ESE Project sub-area under vegetation or buried by soil and/or coal.

Upper Waimangaroa Haul Road (UWHR)

The southwestern section of the proposed UWHR will cross within the very southern end of the Category I Heritage NZ Listed Area – Denniston Historic Area, and Te Tai o Poutini Plan (TTPP) Heritage Schedule – Denniston Historic Area (HH5), which includes recorded archaeological sites associated with the Coalbrookdale Mine (1884 -) and 'Village of Coalbrookdale' (1891-1956). However, within that area it will not impact on any known archaeological and other historic heritage sites or features.

The existing Cedar Creek Road and proposed route of the UWHR crosses an area of extensive underground mine workings associated with the Iron Bridge Mine (L29/98). The workings of Iron Bridge Mine through this area south of the Waimangaroa River to the haul road date from 1887 to 1945. Remains of the Return Airway (concrete pillar) that are not in-situ and possibly other associated in situ archaeological deposits are located immediately adjacent to the existing Cedar Creek Road. Also, there is part of a possible rope road/flume alignment, but this is an unconfirmed feature and consists of a track cutting. Some discarded metal remains of unknown origin will also be impacted upon, but these remains could be moved north outside the construction corridor.

Cedar Creek Road and the proposed route of the UWHR also crosses within the mid-20th century mining sites of Beggs Outcrop or Cedar Creek Mine (L29/99) and the Cooks Lease Area (L29/102).

Approximately 28 power poles are recorded between Burnett's Face and Beggs Outcrop, which are remnants of a power line that had provided power to the mid-20th century mines down the Cedar Creek Road. Eight to twelve of these are located in close proximity to the existing Cedar Creek Road.

The Kiwi Mine Compressor site (L29/101) associated with the Iron Bridge Mine, is located north and clear of the UWHR construction corridor. However, the brick reclining air shaft chimney of the Kiwi Compressor is partially collapsed and structurally vulnerable to further collapse.

Mount Frederick South (MFS)

The proposed MFS Project sub-area encompasses the historic coal mining workings associated with the Taipo Mine and part of the Koranui Mine, which includes above ground remains and extensive underground workings.

The Koranui Mine (L29/14), which operated during the 1880s, was accessed via the Koranui Incline at Conns Creek. The Taipo Mine (L29/100) is a 20th century (1920s to 1940s) underground coal mine across (north of) the Waimangaroa River on the flank of Mt Frederick. This mine was worked and accessed as an extension of mining and a rope-haulage system associated with the Deep Creek and Kiwi workings of the Iron Bridge Mine.

The MFS access road alignment runs east of an area of underground mine workings (L29/101) associated with the Kiwi Mine north of the Waimangaroa River and east of Deep Creek that date to 1901-1921.

Stockton

The proposed Stockton Project sub-area includes a section of the 'B' Tunnel of the Electric Loco Line (L28/20), which is part of the 1908 First Section of the Loco Line. The Electric Loco Line was constructed for the Westport-Stockton Coal Company, as the means of carrying coal from their new mine across the Stockton Plateau to the top of the Stockton Incline. It was powered by electricity and was arguably the first electric railway in New Zealand. It operated until 1953, when it was replaced by the aerial cableway.

According to Project plans the existing planned disturbance (as at 1 April 2027) under current resource consent will destroy approximately the southern half of the Mine Creek Settlement and Infrastructure site (L28/17), as provided for by the 2009 archaeological Authority (No. 2009/327) to destroy the remains of this site by opencast mining. An additional area of planned disturbance (following 1 April 2027) as part of the BPCP Stockton Project sub-area is proposed immediately east of the Mine Creek Settlement site. There are no identified heritage features within this additional area of planned disturbance, however, it may contain unrecorded associated subsurface archaeological remains associated with the Mine Creek site. Mine Creek Settlement and Infrastructure site (L28/17) began construction in 1899 and continued until the mining township was abandoned in the 1930s.

The Stockton Project sub-area will also destroy part of the Jorgen's Drive (L28/16), a tramway alignment that was constructed in c.1925 to link the west section of Mine Creek Mine with further seams to the south. It will also destroy late 19th century historic underground mine workings associated with the Mine Creek (East) Mine at Mine Creek (L28/17), and 20th century historic underground mine workings at the 'B' Tunnel Mine and the 3rd West Dip and Extended Mine (1922-1934).

Pest Exclusion Fenced Areas

Remnants of the Monocable Aerial Cableway (K29/59) are located within proximity to the proposed Denniston North pest free enclosure fence alignment in two places where the fence intercepts the previous cableway alignment. Typically, these remnants (A26–A30) consist of concrete tower foundations and associated metal remains.

The proposed alignment of the Denniston Coalbrookdale pest free enclosure fence will cross the Heritage NZ Listed Area – Denniston Historic Area in two places, which includes recorded archaeological sites associated with the Coalbrookdale Mine (1884-) and 'Village of Coalbrookdale' (1891-1956).

There are no known effects on archaeological or other historic heritage sites or features from the proposed Stockton Mt Augustus and Whirlwind Rise pest exclusion fenced areas.

Māori Cultural Values

This is an assessment of effects on archaeological and historic heritage values and does not include an assessment of effects on Māori cultural values. It is noted that an assessment of effects on Māori values should only be made by the tangata whenua and this has been provided by tangata whenua as a separate Cultural Impact Assessment (CIA) ((Te Rūnanga o Ngāti Waewae 2026). Māori cultural concerns may encompass a wider range of values than those associated with archaeological sites.

The historical association of the general area with the tangata whenua is evident from the recorded sites, traditional histories and known Māori place names. Te Rūnanga o Ngāti Waewae are the Papatipu Rūnanga with manawhenua in the the Kawatiri (Buller) district (Te Rūnanga o Ngāti Waewae 2026:4). As with other areas of Te Tai Poutini, the coastal hills and plateau areas north of the Kawatiri (Buller) River are part of the larger network of trails, trading routes, pa and kāinga sites, mahinga kai, and other areas of cultural significance (Te Rūnanga o Ngāti Waewae 2026:10; Tumahai Jul 2010:8).

There are currently no known archaeological sites of Māori origin recorded within the BPCP. The project footprint does not include any wāhi tapu sites known to Ngāti Waewae (Rūnanga o Ngāti Waewae 2026:25). However, the absence of evidence is not necessarily evidence of absence; particularly, as much of the historic mining evidence and disturbance is associated with underground mining on the Denniston Plateau.

Survey Limitations

It should be noted that archaeological survey techniques (based on visual inspection and minor sub-surface testing) cannot necessarily identify all sub-surface archaeological features or detect wāhi tapu and other sites of traditional significance to Māori, especially where these have no physical remains.

Survey conditions in the northern extent of the MFS Project sub-area were constrained by the thick vegetation cover making the identification of historic coal mining remains extremely difficult. Within the MFS Project sub-area generally, including the proposed Access Road, survey of many areas was constrained by health and safety requirements due to collapsed underground mines.

All underground mine workings within the Project sub-areas, and the 'B' Tunnel of the Electric Loco Line (L28/20) were inaccessible due to health and safety requirements.

Survey access was also restricted at the Mine Creek Settlement and Infrastructure site (L28/17) and Jorgen's Drive (L28/16) due to active mining operations at Stockton.

Archaeological/Historic Heritage Value and Significance

The West Coast Regional Council's (WCRC) Regional Policy Statement (RPS) (Jul 2020: Chapter 4, Method 3) identifies several criteria for evaluating the significance of historic heritage places. These are based on the criteria for inclusion in the New Zealand Heritage List/Rārangi Kōrero set out in Section 66 of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) and are:

a) The extent to which the place reflects important or representative aspects of New Zealand history;

b) The level of association of the place with events, persons, or ideas of importance in the history of the (district/region);

c) The importance of the place to Poutini Ngāi Tāhu;

d) The level of community association with, or public esteem for, the place;

e) The potential of the place for public education;

f) The level of technical accomplishment or value, or design of the place including the rarity of technical accomplishment or design;

g) The symbolic or commemorative value of the place;

h) Whether it is an historic place known to date from early periods of the district's settlement i.e., such items are likely to be included in the schedule;

i) The rarity of the type of historic place; and

j) The extent to which the place forms a key part of a wider historical and cultural complex or historical and cultural landscape.

In addition, Heritage New Zealand (Heritage NZ) has provided guidelines setting out criteria that are specific to archaeological sites (condition, rarity, contextual value, information potential, amenity value and cultural associations) (Heritage NZ 2019: 9-10).

The archaeological value of sites relates mainly to their information potential, that is, the extent to which they can provide evidence relating to local, regional and national history using archaeological investigation techniques, and the research questions to which the site could contribute. The surviving extent, complexity and condition of sites are the main factors in their ability to provide information through archaeological investigation. For example, generally pā are more complex sites and have higher information potential than small midden (unless of early date). Archaeological value also includes contextual (heritage landscape) value. Archaeological sites may also have other historic heritage values including historical, architectural, technological, cultural, aesthetic, scientific, social, spiritual and traditional values.

Where Project sub-areas and historic heritage sites are located on land administered by DOC, the Conservation Act 1987 is also relevant. The values of historic heritage resources on conservation land need to be assessed to establish their significance and what the appropriate management strategy is, given that level of significance, irrespective of whether they have archaeological restrictions under the HNZPTA or heritage restrictions under the District Plan.

In the discussions below, both the RPS and Heritage NZ archaeological sets of criteria have been used to assess the value and significance of the pre-1900 archaeological sites, and the RPS criteria have been used to assess 20th century historic heritage sites that will or may be affected by the Project. This also means that the following assessments meet the criteria referred to by DOC for assessing the significance of historic heritage sites located on land administered by DOC.

One site within the MFS Project sub-area has been evaluated according to the relevant statutory criteria and is scheduled for protection on the BDP Schedule 14.1 Historic Places. This is the Koranui Mine - BDP Schedule 14.1 Historic Places – L29/122 and NZAA L29/14.

Three other sites within the Stockton Project sub-area have been evaluated according to the relevant statutory criteria and are scheduled for protection on the BDP Schedule 14.1 Historic Places. These are the Electric Tramway (Loco Line) – BDP L28/109 and NZAA L28/20; the Mine Creek Settlement – BDP L28/106 and NZAA L28/17; and Jorgen's Drive – BDP L28/105 and NZAA L28/16.

However, none of these four sites are included within Schedule One: Historic Heritage Items and Areas in the Te Tai o Poutini Plan (TTPP) (decisions version notified October 2025), which is the proposed combined Buller, Grey and Westland District Council Plan, that will replace the current individual district plans in 2027.

The UWHR Project sub-area and Denniston Coalbrookdale pest free enclosure fence will cross within the very southern extent of the Category I Heritage NZ Listed Area – Denniston Heritage Area, and Te Tai o Poutini Plan (TTPP) Heritage Schedule – Denniston Historic Area (HH5).

The Denniston Plateau – Value and Significance

A detailed discussion of the historic heritage and archaeological values of the Denniston Plateau is provided in the accompanying Appendix report: BPCP: Historical and Archaeological Background.

The importance of the wider contextual values of Denniston Plateau is acknowledged as a nationally significant industrial heritage landscape and is the premier historic coal mining site in New Zealand comprising numerous inter-related elements of historic coal mining, including mines, transport networks and settlement sites. Its historic coal mining landscape spans a depth of time (all periods of mining are represented) and it is more complete (much remains of mine sites from all periods and some of these remains are rare) than any other in New Zealand. The area has been identified as one of New Zealand's most important industrial archaeological landscapes and an outstanding historic site (Breen Oct 2010; Wilson and Burgess 2007:7; NZHPT 1993).

The history of coal mining at Denniston played an important part in many aspects of the history of New Zealand, such as settlement and immigration, developing the nation, the trade union movement, technological innovation and contribution to an important resource extraction industry. It was extremely important for the development of the West Coast and the Buller region, and its success was an important catalyst for big business investment in coal mining in the area.

Denniston is also the oldest mining settlement on the Buller Plateau and holds a major place in the history of the coal mining industry in New Zealand through the sustained

quality and quantity of its coal output and the special features associated with its operation. Mining on the Plateau spanned from the infancy of the industry to its decline in the 1990s.

It is impossible to properly understand one of the mining sites on the plateau (and its significance) in isolation from the others. Historic heritage sites need to be considered as an integral and important part of the wider historic context/historic landscape of the Denniston Plateau, an extensive and relatively complete coal mining landscape that is unrivalled in New Zealand. While the Denniston Plateau is mostly celebrated for its early history and Incline, it is one of the few places in New Zealand that has such a long history of coal mining and where so much tangible evidence of that history remains.

In recognition of the importance of the place, parts of the Plateau have been Listed under the HNZPTA as the Denniston Historic Area, a Category I historic place (NZ Heritage List No. 7049). The extent of the Listing concentrated on the mainly 19th century mines and mining infrastructure as the features of highest significance.[2] This listing recognises the high historical, archaeological and technical values of the Denniston landscape and describes Denniston as 'one of New Zealand's most significant industrial sites'.

The BDP (Operative Jan 2000, amended Sept 2011) is relevant to the Denniston Plateau area. The Buller District Council has listed the following in the Schedule of Historic Buildings and Structures (Part 14.2) on the Denniston Plateau: the Banbury Arch (250), Stone Retaining Wall (291) and the Denniston Incline Plaque (306).

The Te Tai o Poutini Plan (TTPP) Schedule One: Historic Heritage Items and Schedule 1B: Archaeological Sites (Te Rārangi Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho) includes the Denniston Historic Area (HH5 and ARCH5), for archaeological, historical, social and technological values. The extent of the TTPP scheduled area reflects the NZ Heritage Listed Area – Denniston Heritage Area (No. 7049).

A number of historic coal mining sites on the Denniston Plateau are actively managed by the Department of Conservation (DOC) including the Coalbrookdale area (fan house, mine entrance and rope roads), Burnett's Face, the surface rope road across the plateau, the Denniston bins, the Denniston Incline, the bridle track and Conns Creek.

Escarpment Extended (ESE)

The workings within the ESE date from a relatively recent era of coal mining on the Denniston Plateau and may not seem significant in isolation. In a physical sense, the Whareatea and the Sullivan Mines were linked by the Monocable Aerial Cableway and have a strong association with each other, as well as other sites on the Denniston Plateau. The mines were also linked through their common ownership (the State), through their location, through their technology, and through their association with earlier mining on the Denniston Plateau. There were also links with other mines in the area, including the previous Escarpment mine, where the development of hydraulic mining techniques enabled the re-opening of the Whareatea, and the subsequent development of the Sullivan West. Whareatea Mine also has a strong association with the Coalbrookdale Mine, as it is an extension of this mine. These sites were part of a system and are now part of an

[2] https://www.heritage.org.nz/the-list/details/7049.

archaeological landscape that covers a large geographic area, and that spans over a hundred years, stretching back to the 1870s (Watson and Wright 2004:28).

Monocable Aerial Cableway (K29/59)

The Monocable Aerial Cableway relates to 20th century coal mining on the Denniston Plateau, having been constructed between 1950 and 1953 and used until 1968. Although recorded in the NZAA ArchSite database it is not an archaeological site as defined within the HNZPTA as it post-dates 1900.

The heritage significance of this site has been assessed previously as being of high heritage value (Watson and Wright 2004; Watson Aug 2010), and we concur with the level of significance assigned. The significance assessments are summarised below.

The remains of the cableway, which consist of most of the foundations, three standing towers and associated infrastructure, such as the drive station at the Whareatea and the tensioner (Watson and Wright 2004:25), are in good condition and are relatively complete.

The site has technological value, being designed by British Ropeway Engineering Co. Ltd of London but constructed locally over uneven terrain by the Public Works Department and State Mines Denniston engineers. Coal buckets were attached to an endless cable but run off for emptying at the brakehead and to allow the cable to be tensioned. The aerial cableway was part of a series of changing and progressive coal transport systems on the Denniston Plateau – it replaced the surface rope road in 1954 and was replaced by road transport in 1968.

The public educational potential of the ropeway is high and already recognised at the Lower Aerial Tower, which is one of the towers that has been restored and is actively managed by DOC, and public interpretation on the cableway is provided.

However, it is the external context of the aerial cableway and its place in the Denniston historical landscape that is most important. In a physical sense, the Whareatea and Sullivan Mines were linked by the aerial cableway. The aerial cableway was a key component of this landscape for several years and the retention of its physical remnants is vital to our continued understanding and appreciation of this landscape (Watson Aug 2010).

The site is likely to have cultural associations for those who worked in association with it.

The Lower Aerial Tower is included within the Heritage NZ Listed Denniston Historic Area but not the aerial cableway as a whole.

Whareatea Mine (K29/72)

The Whareatea Mine was an underground mine that was operational from 1926 to 1988. Although recorded in NZAA ArchSite it is not an archaeological site as defined within the HNZPTA as it post-dates 1900.

Wright and Watson (2004) assessed the collective heritage significance of the Whareatea Mine, Sullivan and Sullivan West Mines. The significance of the Whareatea Mine was also reassessed in 2009-2010 (Watson Apr 2009 and Jun 2010; Breen Oct 2010) and in 2012 (Watson May 2012) prior to the development of the Escarpment Mine and widening of Whareatea Road through the Whareatea Mine site. We concur with the level of significance assigned and these assessments are summarised below.

Overall, the Whareatea Mine has moderate to high heritage values. The site is in reasonable condition and has excellent internal and external contextual values. The site is likely to have cultural associations for those who worked there.

The distinguishing features of the Whareatea Mine are the length of its operation and the fact that it was worked as a hydro mine for several years. Numerous other hydro coal mines operated on the West Coast during the 20th century. Remnants of 20th century underground coal mines are known to exist at the Sullivan, Sullivan West (Watson and Wright 2004), Rewanui, Fly Creek (Stockton) and Charming Creek mines and there are likely to be more remains at other mines. As such, the Whareatea Mine cannot be said to be rare, but it is an excellent example of the mid-late 20th century mines on the plateau and is also an important part of the ongoing story of the search for coal at Denniston, not to mention the development of new mines and the change in mining technology.

The remnants of the Whareatea Mine from a relatively recent era of coal mining on the Denniston Plateau may not seem significant in isolation, as there were a number of other mines dating from this time in Buller and on the West Coast and these sites are not in themselves rare. However, these sites need to be considered as an integral and important part of the wider historic context/historic landscape of the Denniston Plateau, an extensive and relatively complete coal mining landscape that is unrivalled in New Zealand. The Whareatea was the first State Coal Department mine opened on the plateau and its opening led to the construction of the aerial cableway.

A considerable amount is known about the overall history of the Whareatea, Sullivan, and Sullivan West mines, and about the history and function of the individual components that make up each of these mining systems. This history exists in the form of primary and secondary sources, photographs, and oral histories.

The interpretative and educational values of the Whareatea and Sullivan Mines and the Monocable Aerial Cableway are considered to be high because they are part of the broader and associated Denniston heritage landscape, that includes the township of Denniston and mines such as the Coalbrookdale. Also, due to their relatively good condition and being an easily accessible example of a type of mining which has seen much of its infrastructure destroyed in other areas.

The current assessment of the significance of the Whareatea, Sullivan and Sullivan West Mines was carried out prior to the open-cast mining and destruction of historic heritage remains at other late 20th century mines on the plateau – Escarpment Mine, Birchall's Co-Operative Party Mine and Plateau Mine. The loss of these examples of 20th century mining sites on the Denniston Plateau would have increased the significance of the remaining mining sites from this period.

Sullivan Mine (K29/98)

The Sullivan Mine is a 20th century underground coal mine. Sullivan was opened 1.6km northward of Whareatea along the aerial system in 1953. Although recorded on NZAA ArchSite it is not an archaeological site as defined within the HNZPTA as it post-dates 1900.

Watson and Wright (2004) assessed the significance of the Whareatea, Sullivan and Sullivan West Mine collectively due to their nature, their strong association with each other and other features on the Denniston Plateau, and we concur with their assessment, which is summarised below.

Overall, the Sullivan Mine has lower heritage values than the Whareatea Mine with fewer surviving surface remains; however, it also has other similar and collective heritage values to the Whareatea Mine, with their strong association with each other and other features on the Denniston Plateau. The site is in reasonable condition and has excellent internal and

external contextual values. It is not a rare site type but has good information and amenity potential. The site is likely to have cultural associations for those who worked there. The site derives its greatest importance from the wider historic context/historic landscape of the Denniston Plateau, an extensive and relatively complete coal mining landscape that is unrivalled in New Zealand.

Drill Hole and Building / Metal Bolts

The isolated drill hole and possible building remains and metal bolts west of the Sullivan Mine site have no known history or context but are undoubtably associated with 20th century activity on this area of the Denniston Plateau. As such, it is difficult to determine their value, but we consider them to be of little or no historic heritage or archaeological value.

Power Poles

The heritage significance of the power poles associated with this power line has been assessed previously (Watson Aug 2010) as being limited, and most of their value is contextual, derived from their association with the surrounding landscape and mining at either the Whareatea or Escarpment Mine(s) during the 20th century.

Transport Corridor (UWHR)

Iron Bridge Mine (L29/98)

The Ironbridge Mine is the beginning of the workings which extend to the Burning Mine and Kiwi Mine, over the Waimangaroa River and up the flanks of Mt Frederick. Development of the Iron Bridge Mine began in 1882 with the workings of the mine substantially expanding by 1899, reaching the area south of the Waimangaroa River to the haul road and within the UWHR Project sub-area. Therefore, surface remains and underground workings may date to before 1900 and are an archaeological site as defined within the HNZPTA.

An assessment of the archaeological value of the Iron Bridge Mine (L29/98) based on the RPS and Heritage NZ criteria is provided below in Table 3 and Table 4, as this site has not been previously assessed. Overall, this site is moderate to high archaeological and heritage value and significance.

Table 3. Assessment of the historic heritage significance of site L29/98 Iron Bridge Mine based on the criteria in the WCRC RPS

Criterion	Comment	Significance Evaluation
Historic values	Iron Bridge Mine was a substantial coal mine on the Denniston Plateau and operated for over 50 years. With Coalbrookdale it was one of two major Westport Coal Company mines in operation by 1888, with over 100 men employed underground. The Westport Coal Company was a major player in coal mining on the Denniston and Stockton plateaux until the State takeover of mines in both areas in the mid-late 1940s. Iron Bridge Mine is part of the story of the	High

Criterion	Comment	Significance Evaluation
	development of the Westport Coal Company and Denniston.	
Importance of the place to Poutini Ngāi Tāhu	No known importance	n/a
Community Associations	Within the West Coast and Denniston community there is a strong association with the coal mining industry. Coal mining is still a major industry on the West Coast and mines like Iron Bridge would have a social significance for local communities. Relatives of those who worked at the site, are likely to have associations with the place.	Moderate
Public education potential	Iron Bridge Mine has good public education potential due to its association and proximity to the sites along the Coalbrookdale Walkway. Public access and interpretation could easily be developed from Burnett's Face and Cedar Creek Road to the main Iron Bridge surface remains east of Burnett's Stream, which comprise of the stone drive (second mine entrance), the bathhouse foundations, a chimney and a water tank, with the remains of several dwellings/baches associated with Cedar Settlement	High
Technological value	The mining techniques used at the Iron Bridge Mine were not unique from other West Coast mining areas, although it did operate for over 50 years and the underground workings are extensive. The eastern workings of the Iron Bridge Mine were the deepest in the entire Buller Coalfield.	Moderate
Symbolic / Commemorative values	No known values	n/a
Early period of the district's settlement	The site is associated with early coal mining activity on the Denniston Plateau the Buller district. In 1882 the Banbury Mine was driven right through to Burnett's Face from where more developments began, including the Iron Bridge and Coalbrookdale mines.	High
Rarity	The Iron Bridge Mine is not rare, being a continuation of expanding underground coal mining on the Denniston Plateau from the late 19th century into the early – mid-20th century. This site is not scheduled in the District Plan.	Limited
Historical and cultural landscape.	The site is part of the wider historical coal mining landscape throughout the Buller region and specifically the nationally significant industrial heritage landscape of the Denniston Plateau. This site has a strong association with the other coal	High

Criterion	Comment	Significance Evaluation
	mining features on the Denniston Plateau. It was linked by underground mining expansion and the coal haulage system from Burnetts Face, through to encompass the Kiwi Mine, over the Waimangaroa River and up the flanks of Mt. Frederick to the Deep Creek and Taipo Mines. This site reflects representative aspects of the local and regional history and is part of the story of development of the Westport Coal Company and coal mining on the Denniston Plateau.	

Table 4. Assessment of the archaeological values of site L29/98 Iron Bridge Mine based on Heritage NZ criteria (Heritage NZ 2019: 9-10)

Value	Assessment
Condition	The main surface remains of the Iron Bridge Mine south of the Waimangaroa River consist of the stone drive (second mine entrance), the bathhouse foundations, a chimney and a water tank with the remains of several dwellings/baches associated with Cedar Settlement in the bow of Burnett Stream. Collectively this site is the beginning of extensive underground mine workings which extend to the burning mine, Kiwi Mine, over the Waimangaroa River and up the flanks of Mt. Frederick to the Deep Creek and Taipo Mines.
Rarity	The Iron Bridge Mine is not rare, being a continuation of expanding underground coal mining on the Denniston Plateau from the late 19th century into the early – mid-20th century.
Contextual value	This site reflects representative aspects of the local and regional history and is part of the story of development of the Westport Coal Company and coal mining on the Denniston Plateau. This site has a strong association with the other coal mining features on the Denniston Plateau. It was linked by underground mining expansion and the coal haulage system from Burnetts Face through to encompass the Kiwi Mine, over the Waimangaroa River and up the flanks of Mt. Frederick to the Deep Creek and Taipo Mines.
Information potential	The information potential of the Iron Bridge Mine is relatively good, both from primary and secondary sources. Some survey and relocation of heritage features have taken place but further information could be gained through a more detailed spatial analysis of the wider Iron Bridge Mine site.
Amenity value	The Iron Bridge Mine is located on LINZ land and is relatively accessible from Cedar Creek Road. It has high potential amenity value if access was developed from Burnett's Face and Cedar Creek Road to the main surface remains east of Burnett's Stream and further to Kiwi Mine remains, across the Waimangaroa River and up the flanks of Mt. Frederick to the Deep Creek Mining remains.
Cultural associations	The site is associated with early European settlement and industry in the region
Other	This site dates from an early period of the districts settlement and also has historical, public education potential and some technological values. It is part of and contributes to a wider historic landscape

Beggs Outcrop Mine (L29/99)

Beggs Outcrop was a small mid-20th century state-owned coal mine operating in the late 1950s and early 1960s.

An assessment of the historic heritage value of Beggs Outcrop based on the RPS is provided below in Table 5 as this site has not been previously assessed. Overall, this site has limited - moderate heritage value and significance.

Table 5. Assessment of the historic heritage significance of site Beggs Outcrop (L29/99) based on the criteria in the WCRC RPS

Criterion	Comment	Significance Evaluation
Historic values	Beggs Outcrop is an example of a small mid-20th century state-owned coal mine of short duration. This site reflects representative 20th Century aspects of the local and regional history and is part of the story of development of the State Mines Department and coal mining on the Denniston Plateau.	Limited - Moderate
Importance of the place to Poutini Ngāi Tāhu	No known importance	n/a
Community Associations	Within the West Coast and Denniston community there is a strong association with the coal mining industry. Coal mining is still a major industry on the West Coast and mines like Beggs Outcrop would have a social significance for local communities. Possibly those who worked at the site or their relatives, are likely to have associations with the place.	Limited
Public education potential	Beggs Outcrop has some public education potential by its proximity to Cedar Creek Road and a variety of remnant mid-20th Century mining remains that could be interpreted, including an impressive exposed coal seam	Moderate
Technological value	The mining techniques used at Beggs Outcrop were not unique from other small West Coast mining areas at the time	Limited
Symbolic / Commemorative values	No known values	n/a
Early period of the district's settlement	The site is not associated with early coal mining activity on the Denniston Plateau	Nil
Rarity	Remnants of 20th century underground coal mines are known to exist at the Whareatea, Sullivan, Sullivan West (Watson and Wright 2004), Rewanui, Fly Creek (Stockton) and Charming Creek mines, and there are likely to be more remains at other mines. As such, the Beggs Outcrop cannot be said to be rare.	Limited
Historical and cultural landscape.	The site is part of the wider historical coal mining landscape throughout the Buller region and specifically the nationally significant industrial heritage landscape of the Denniston Plateau. However, it does	Moderate

Criterion	Comment	Significance Evaluation
	not contribute significantly to that landscape	

Cooks Lease Area Mine (L29/102)

The Cooks Lease Area Mine is an example of a small private mid 20th century coal mine of short duration.

An assessment of the historic heritage value of the Cooks Lese Area Mine (L29/102) based on the RPS is provided below in Table 6 as this site has not been previously assessed. Overall, this site has limited heritage value and significance, with the site deriving its greatest importance from the wider historic context/historic landscape of the Denniston Plateau.

Table 6. Assessment of the historic heritage significance of site Cooks Lease Area (L29/102) Mine based on the criteria in the WCRC RPS

Criterion	Comment	Significance Evaluation
Historic values	Cooks Lease Area is an example of a small private mid-20th century coal mine of short duration. This site reflects representative 20th Century aspects of the local and regional history and is part of the story of coal mining on the Denniston Plateau.	Limited
Importance of the place to Poutini Ngāi Tāhu	No known importance	n/a
Community Associations	Within the West Coast and Denniston community there is a strong association with the coal mining industry. Coal mining is still a major industry on the West Coast and mines like Cooks Lease Area would have a social significance for local communities. Possibly those who worked at the site or their relatives, are likely to have associations with the place.	Limited
Public education potential	This site has little public education potential with few visible remains	Limited
Technological value	The open cast mining techniques used at Cooks Lease Area were not unique from other small West Coast mining areas at the time	Limited
Symbolic / Commemorative values	No known values	n/a
Early period of the district's settlement	The site is not associated with early coal mining activity on the Denniston Plateau	Nil
Rarity	Cooks Lease Area it is one of many small private coal mines that operated on the West Coast during the 20th century. Therefore, this site is not rare and, with very few	Limited

Criterion	Comment	Significance Evaluation
	remains, it is not a good representative example.	
Historical and cultural landscape.	The site is part of the wider historical coal mining landscape throughout the Buller region and specifically the nationally significant industrial heritage landscape of the Denniston Plateau. However, it does not contribute significantly to that landscape	Limited - Moderate

Power Poles

The heritage significance of the power poles associated with this power line has also been assessed previously (Watson Aug 2010) as being limited, and most of their value is contextual, derived from their association with the surrounding landscape and mining along Cedar Creek Road from the 1950s to 1970s.

Mount Frederick South (MFS)

Koranui Mining Area and Incline (L29/14)

The Koranui Mine and Incline (L29/14) has been evaluated according to the relevant statutory criteria and has been scheduled for protection on the BDP (Schedule 14.1 Historic Buildings and Sites - L29/122). However, it is not included on Schedule One of the Te Tai o Poutini Plan (TTPP). The remains of the Koranui Mining area are also pre-1900 and are an archaeological site as defined within the HNZPTA.

The archaeological and other historic heritage values of the Koranui Incline were previously assessed by Watson (Dec 2009) but not specifically the Koranui mining area, which is affected by the MFS Project sub-area. Therefore, an assessment of the values of the collective Koranui Mining area (including the Koranui Incline) based on the RPS and Heritage NZ criteria is provided below in Table 7 and Table 8. Overall, this site has moderate to high archaeological and heritage value and significance.

Table 7. Assessment of the historic heritage significance of site L29/14 Koranui Incline and Mining Area based on the criteria in the WCRC RPS

Criterion	Comment	Significance Evaluation
Historic values	The Koranui Incline and Mine have strong historical associations with the Koranui Coal Mining Company, Captain Williams and the Black Diamond Line, James Mills and the Union Steam Ship Company and the Westport Coal Company. The link between coal mines and shipping lines a key factor in the history of the Koranui coal mine. The Koranui Mine also came to own a key part of the Conns Creek Branch railway, which was part of the transport	High

Criterion	Comment	Significance Evaluation
	network that connected Denniston mines to Westport. The Westport Coal Company was a major player in coal mining on the Denniston and Stockton plateaus until the State takeover of mines in both areas in the mid-late 1940s. A reasonable amount of historical information is known about the Koranui Mine and Incline, including when it was built and operated.	
Importance of the place to Poutini Ngāi Tāhu	No known importance	n/a
Community Associations	Within the West Coast and Denniston community there is a strong association with the coal mining industry. Coal mining is still a major industry on the West Coast and mines like Koranui would have a social significance for local communities. Relatives of those who worked at the site, are likely to have associations with the place.	Moderate
Public education potential	The Koranui Incline is on public conservation land but is relatively inaccessible at present. It has good public education potential to be developed as a walking track providing access to spectacular views and a relatively intact 19th century coal mining landscape. Access to the incline and mining area could provide educational opportunities into the operation of the incline itself, the nature and history of the Koranui mine, and the associated settlement. This mining landscape provides a contrast to the neighbouring much larger-scale Denniston, and is also part of the story of the development of the Westport Coal Company and Denniston.	Moderate
Technological value	The mining techniques used at the Koranui Mine were not unique from other West Coast mining areas. However, its incline is technologically distinguished by its length (it was the longest of the five) and with having an overhead cable, as opposed to a cable that ran along the ground, and because the exact nature of the incline changed, beginning as a reciprocating jig (as used at Denniston) and being remodelled as an endless rope system (as used at Millerton and Stockton).	Moderate - High
Symbolic / Commemorative values	No known values	n/a
Early period of the district's settlement	The site is associated with early coal mining activity in the Buller district. The Koranui incline was constructed in the late	High

Criterion	Comment	Significance Evaluation
	1870s with mining commencing within the Koranui mining area in the 1880s. The Koranui Mine and Incline (L29/14) has been evaluated according to the relevant statutory criteria and has been scheduled for protection on the BDP (Schedule 14.1 Historic Buildings and Sites - L29/122).	
Rarity	The Koranui mining area is not rare historic place as it is just one of a number of small unsuccessful West Coast coal mines. However, it is associated with an incline, one of five in the Buller region, but distinguished by its length and overhead cable, and because the exact nature of the incline changed, beginning as a reciprocating jig and being remodelled as an endless rope system. The Koranui Mine also came to own a key part of the Conns Creek Branch railway, which was part of the transport network that connected Denniston mines to Westport.	Moderate - High
Historical and cultural landscape.	The site is part of the wider historical coal mining landscape throughout the Buller region and specifically up the Waimangaroa and the Denniston Plateau. Denniston Plateau is recognised as a nationally significant industrial heritage landscape and the premier historic coal mining site in New Zealand. The extensive intact and varied remains of the Koranui Incline and Mine do contribute highly to this landscape.	High

Table 8. Assessment of the archaeological values of site L29/14 Koranui Incline and Mining based on Heritage NZ criteria (Heritage NZ 2019: 9-10)

Value	Assessment
Condition	The archaeological remains of the Koranui Mine include the Incline, the remains of the mines, ventilation system, transport network (incline and tramway), settlement and communication system, which are relatively intact and undisturbed. No evidence of the coke ovens (which became part of the Koranui mine when it took over the Wellington mine) survive, nor of the Wellington mine itself or the railway sidings on the south bank of the Waimangaroa. The lower end of the incline has been destroyed by later alluvial gold mining and the branch railway line is now a road. However, collectively the site it is a relatively intact 19th century coal mining landscape.
Rarity	The Koranui Mining area is not rare as it is just one of a number of small unsuccessful West Coast coal mines. However, it is associated with an incline, one of five in the Buller region, but distinguished by its length (it was the longest of the five) and with having an overhead cable, as opposed to a cable that ran along the ground, and because the exact nature of the incline changed, beginning as a reciprocating jig (as used at Denniston) and being remodelled as an endless rope system (as used at Millerton and Stockton). The Koranui Mine

Value	Assessment
	also came to own a key part of the Conns Creek Branch railway, which was part of the transport network that connected Denniston mines to Westport.
Contextual value	The internal context of this site is good with the 19th century coal mining landscape relatively complete. The regional context of the site is the mining that has taken place throughout the Buller region, and specifically up the Waimangaroa and the Denniston Plateau. Denniston Plateau is recognised as a nationally significant industrial heritage landscape and the premier historic coal mining site in New Zealand. The Denniston mines have the closest association with the mines on the Stockton plateau, which share a similarly remote and hostile environment and, for the most part, owners – the Westport Coal Company.
Information potential	The information potential of the Koranui Incline is good, with the survey and relocation of numerous heritage features along the incline, tramway and mining area. Further information could be gained through a more detailed spatial analysis of the site and investigation.
Amenity value	The Koranui Incline is on public conservation land but is relatively inaccessible at present. It has high potential amenity value if developed as a walking track providing access to spectacular views and a relatively intact 19th century coal mining landscape. This landscape provides a contrast to the neighbouring much larger-scale Denniston, and is also part of the story of the development of the Westport Coal Company and Denniston. Walking the incline to the mining area provides insight into the operation of the incline itself and the nature of the Koranui mine, including the settlement site, the numerous abandoned portals and the communication network used at the mine.
Cultural associations	The site is likely to have cultural associations for those whose relatives worked there.
Other	This site also has high historical, technological and historic landscape values and is associated with early coal mining activity in the Buller district (see Table 5)

Taipo Mine (L29/100)

Taipo is the local name of the mine workings across (north of) the Waimangaroa River on the flank of Mt. Frederick. This mine was worked and accessed from the 1920s to the 1940s as an extension of mining and a rope-haulage system associated with the Deep Creek and Kiwi workings of the Iron Bridge Mine. Consequently, it is not an archaeological site as defined within the HNZPTA as this site post-dates 1900.

An assessment of the historic heritage significance of the Taipo Mining area based on the WCRC RPS criteria is provided below in Table 9, as this site has not been previously assessed. Overall, this site has moderate heritage value and significance.

Table 9. Assessment of the historic heritage significance of site L29/100 Taipo Mining area based on the criteria in the WCRC RPS

Criterion	Comment	Significance Evaluation
Historic values	This mine was worked and accessed as an extension of mining and a rope-haulage system associated with the Deep Creek and Kiwi workings of the Iron Bridge Mine. Iron Bridge Mine was a substantial coal mine on the Denniston Plateau and operated for over 50 years. Therefore, it	Moderate

Criterion	Comment	Significance Evaluation
	reflects representative aspects of the local and regional history and is part of the story of development of the Westport Coal Company and coal mining on the Denniston Plateau. There is limited historical information known about the Taipo Mine.	
Importance of the place to Poutini Ngāi Tāhu	No known importance	n/a
Community Associations	Within the West Coast and Denniston community there is a strong association with the coal mining industry. Coal mining is still a major industry on the West Coast and mines like Taipo have a social significance for local communities. Relatives of those who worked at the mine, are likely to have associations with the place.	Moderate
Public education potential	The Taipo mining remains are located on LINZ land but it is very inaccessible, except either up the steep Koranui Incline or through Deep Creek. However, the 20th century remains of this mine are extensive and varied, and are relatively intact and undisturbed because of its isolated location and the absence of later modern-era large scale mechanical mining. This includes artefactual material that is often missing from other more accessible sites.	Moderate
Technological value	The mining techniques used at Taipo Mine were not unique from other small 20th century West Coast mining areas. This mine was worked and accessed via an extensive rope-haulage system	Limited
Symbolic / Commemorative values	No known values	n/a
Early period of the district's settlement	The Taipo Mine remains date to 1920 – 1940. This site is not included in the scheduled in the District Plan	Limited
Rarity	The Taipo Mine area is not a rare historic place as it is just one of a number of small 20th century West Coast coal mines. Although the remains of this mine are extensive and varied, and are relatively intact and undisturbed, these remains are similar to and an extension of the mining remains and the rope-haulage system associated with the Deep Creek and Kiwi workings of the Iron Bridge Mine located between Taipo Mine and the Waimangaroa River to the south.	Moderate
Historical and cultural landscape.	The site is part of the wider historical coal mining landscape throughout the Buller region and specifically the nationally significant industrial heritage landscape of	High

Criterion	Comment	Significance Evaluation
	the Denniston Plateau. This site has a strong association with the other coal mining features on the Denniston Plateau. It is linked by underground mining and a coal rope road with the Deep Creek and Kiwi workings of the Iron Bridge Mine. Iron Bridge – Deep Creek Mining area and other features on the Denniston Plateau. The extensive intact and varied remains of the Taipo Mine do contribute highly to this landscape.	

Stockton Plateau – Value and Significance[3]

Stockton Plateau Heritage Landscape

The only other place comparable to the coal mining landscape of Denniston Plateau for scale of coal mining and a continuum of the history of mining is on the Stockton Plateau. However, the Stockton mining sites have been significantly affected by continued ongoing mining operations.

Several historic coal mining sites on the Stockton Plateau are actively managed by the Department of Conservation (DOC). A 500-hectare historic and ecological reserve was established at Millerton on the Stockton Plateau in 2003 and added to in 2005 (by DOC and Solid Energy) (Millerton-Stockton Historic Area). At that time a Memorandum of Understanding (MoU) between Solid Energy New Zealand Limited (subsequently assigned to BT Mining Ltd), the Millerton and Plateau Protection Society Incorporated (MAPPS), DOC and BDC reinforced that the vision, goals and objectives of the reserve were to preserve and enhance the historic and natural heritage while providing access for visitors. Much of the infrastructure of the Millerton Mine lies within this reserve, including the portals of the Old Dip and Mine Creek mines, parts of the rope roads for each mine, the bathhouse and the pack-track.

Stockton

Stockton Electric Tramway (Loco Line) (L28/20)

The Stockton Electric Tramway (Loco Line) (L28/20) has been evaluated according to the relevant statutory criteria and has been scheduled for protection on the BDP (Schedule 14.1 Historic Places – L28/109). It is not scheduled for protection in the TTPP.

The tramway operated almost continuously from 1908 until 1953, when the aerial ropeway began working.

The archaeological and other heritage values of the Electric Loco Line were also discussed in relation to the criteria in the WCRC RPS by Watson (2008, May 2023), who concluded that this site has high historical, archaeological, technological and contextual values.

[3] For a detailed discussion of the historic heritage and archaeological values of the Stockton Plateau see the accompanying Appendix report: BPCP: Historical and Archaeological Background.

Overall, the Electric Loco Line is of high significance. We concur with the level of significance assigned and the assessment is summarised below.

The electric loco line is an important part of the story of both coal mining and electrification in Aotearoa New Zealand, and particularly for our understanding of the development of the coal mining industry in the Buller region. Coal mining was an important motive and power source during the 19th and early 20th centuries and, as such, was an important and potentially highly profitable industry. It has been an important component of Buller's economic and social history since the 1870s, with many in the region having worked in the mines, or in industries that supported coal mining.

It also has high historical values due its association with the Westport-Stockton Coal Company, which was an important player on the history of coal mining, both nationally and particularly in the Buller region, and for its association with the development of electrical motive power in New Zealand. The Westport-Stockton Coal Company's mine on the Stockton plateau was the first mine in the country to be developed with electricity as the main motive power, although it was not the first mine to use electricity, or even the first mine to use electricity haulage. It may, however, have been the first mine to develop electric haulage from the outset.

The electric loco line at Stockton is a significant milestone in the development of electric railway in New Zealand. The Westport-Stockton Coal Company's use of electricity from the outset was also an important milestone in the increasing use of electricity in New Zealand, and reflects the importance of industry – and particularly mining – in the use and development of this technology.

The Electric Loco Line is a rare site type and arguably one of the first electric railway lines in the country. While the whole of the Electric Loco Line is rare, it is the first section (from the top of the Stockton Incline to the A Tunnel portal) that is considered nationally significant, as this section was the first electric railway line built in New Zealand. The oldest section of the line is also significant because it contains a range of in situ features.

The electric loco line is of high technological significance as it was associated with the early use of electrical power in New Zealand, and was arguably the first railway line to use this technology. This was due not just to its use of electricity, but also to the unusual gauge used and 'the early use of 3 phase a.c. [alternating current] transmission to the substations and mine' (Harris 2008).

The electric loco line is a significant part of a much larger coal mining landscape or context that takes in the Stockton plateau as a whole. This extends the Westport-Stockton Coal Company's landscape to include the subsequent mining of State Coal, which continued to use the loco line for nearly 10 years after it took over the Stockton mine. The Westport-Stockton Coal Company began operations in the early 1900s and continued to operate until it was taken over by State Coal Mines in 1944. For almost the entirety of that period, the loco line was a key part of the haulage system that transported coal from the mines down to the bins at Ngākawau and on to the port at Westport – all of the company's coal that left the plateau was carried off via the loco line. This is an archaeological landscape that remains surprisingly intact today and thus quite legible, from the powerhouse at Ngākawau (although not the original bins), the Stockton incline, the settlements (Tintown more than Stockton) and the mines themselves, including the workings. The losses to this landscape have come about as a result of subsequent mining and, while not a justification for this, this represents the continuing story of mining on the plateau. The archaeological landscape

is a particularly important one, given the ongoing significance of coal mining – especially on the Stockton plateau – for the Buller region.

Mine Creek Settlement (L28/17)

The Mine Creek Settlement (L28/17) has been evaluated according to the relevant statutory criteria and has been scheduled for protection on the BDP (Schedule 14.1 Historic Places - L28/106). It is not scheduled for protection in the TTPP.

Mine Creek Settlement has also been previously assessed as having moderate to high significance, chiefly because of its archaeological potential, its historical associations and the broader landscape of which it is part (Watson 2007). This landscape is that of the Westport Coal Company, one of the key players in the development of coal mining on the West Coast, and thus in the history and economy of the coast. Mine Creek was a small, isolated, short-lived coal mining settlement occupied in the early years of the 20th century, following the expansion of the Westport Coal Company's Millerton Mine, and lasted approximately 30 years.

It was considered by Watson in 2007 as the best preserved of such settlements on the West Coast (and possibly throughout New Zealand). However, part of the site has since been destroyed by mining activity in the area, environmental processes and previous archaeological investigation under an Authority from Heritage NZ. Remaining features are buried beneath gorse and little of the settlement is visible today, with the industrial structures being the most prominent surviving features. Of the humble domestic dwellings that once stood here, there is little left, although previous archaeological survey and investigation in 2009-2010 have managed to relocate a reasonable proportion of the remains of buildings and structures that once made up this settlement.

While Mine Creek Settlement has potentially good interpretation values because of its archaeological potential, its historical association with the Westport Coal Company, and its position within that company's archaeological landscape, it is located within an active mining site which restricts any access.

According to Watson (2007) it was difficult to establish when most of the buildings and structures at Mine Creek settlement were constructed. The only buildings that were definitively on site prior to 1900 are the air compressor shed, boiler shed and ventilation flue. As such, this is the only site that is definitely protected under the HNZPTA.

Overall, the Mine Creek Settlement and Infrastructure site (L29/17) is now considered to have moderate significance given the modification to this site since 2007 by modern mining activities and archaeological investigation under a HNZ archaeological Authority.

Jorgen's Drive (L28/16)

Jorgen's Drive (L28/16) has been evaluated according to the relevant statutory criteria and has been scheduled for protection on the BDP (Schedule 14.1 Historic Places - L28/105). It is not scheduled for protection in the TTPP.

Jorgen's Drive dates from c.1925 and is not an archaeological site (pre-1900) as defined within the HNZPTA as it post-dates 1900. Overall, this site is considered to be limited to moderate significance.

This site comprises an isolated 700m long cutting with stone faced benching and embankments. It is relatively intact except for recent damage in one section by a modern mining road. There is limited known historical information about this tramway drive,

except that it was supposed to link the west section of Mine Creek mine with further seams to the south. It is associated with Jorgenson who was either an engineer or the manager who initiated the tramway. The site is part of the story of coal mining on the Stockton Plateau. This site is not aesthetically notable, is very inaccessible within an active mining area and almost invisible under thick native vegetation.

Underground Mine Workings

The late 19th – early 20th century historic underground mine workings affected by the Stockton Project sub-area – Mine Creek (East) Mine, 'B' Tunnel Mine and 3rd West Extended Mine are well recorded and understood, although their current state and condition is unknown. They are of limited heritage significance, however, any opportunity to record and recover evidence of the mining techniques employed and the conditions of the workers within the underground workings would contribute to our understanding of mining and miners of this period.

ASSESSMENT OF HISTORIC HERITAGE EFFECTS AND MITIGATION

The nature and significance of the archaeological and other historic heritage places within the Project sub-areas have been assessed above. The potential impact of the proposal on the identified places is now considered, particularly in relation to direct physical impacts, as well as setting and context.

The likely adverse effects on historic heritage because of each Project sub-area of the BPCP and associated infrastructure, and recommended mitigation measures, are outlined below followed by an assessment of the overall effects on historic heritage of the BPCP.

In addition to specific mitigation recommendations for direct adverse effects on heritage sites, additional initiatives are also proposed to address any shortfall in mitigation recommendations because of the BPCP project on heritage sites.

It is recommended that prior to the commencement of activities associated with disturbing identified archaeological and other historic heritage sites, that Bathurst commission the development of a Historic Heritage Management Plan (HHMP) with stakeholders for the Project sub-areas[4] to:

- Document and describe the strategy, objectives and actions that Bathurst propose to mitigate adverse effects on historic heritage during the pre-mining, mining and post-mining phases of each of the Project sub-areas;
- Document and describe the strategy, objectives and actions that Bathurst propose to provide additional historic heritage compensation measures to address any shortfall in specific mitigation measures for adverse effects on historic heritage within the Project sub-areas;
- Demonstrate compliance with the conditions on the Project sub-areas in statutory approvals.

For practical implementation the HHMP will incorporate any Archaeological Management Plans (AMPs) covered by an Archaeological Authority under the FTAA.

Denniston Plateau

The reworking of underground mines by opencast mining had not occurred at Denniston until the Escarpment Mine Project commenced in 2014. This has resulted in the high survival of previous mine workings within this landscape. Abandoned mine sites are apparent in the form of landscape modification, surface infrastructure and other material present across the vast geographical area of the plateau.

The wealth of knowledge of the coal mining remains on the Denniston Plateau because of extensive previous historic research, archaeological survey and assessment has allowed the BPCP to undertake an extended options assessment to avoid historic heritage sites where

[4] For example, a HHMP had been developed and completed previously for the separate Bathurst Escarpment project.

possible. The sites to be avoided were determined because of their heritage value under the criteria discussed above.

In particular various options were considered to link the Denniston and Stockton Plateaux. The UWHR has been selected to avoid the archaeological sites and other heritage features located within the Heritage NZ Listed Area – Denniston Historic Area, a Category I historic place (NZ Heritage List No. 7049) and Te Tai o Poutini Plan (TTPP) Heritage Schedule One: Historic Heritage Items and Areas and Archaeological Sites – Denniston Historic Area (HH5).

However, the proposed destruction of some surface mine remains and extensive underground mining remains will contribute to the cumulative effects of the ongoing loss of features associated with sites and to their setting within the Denniston Plateau. Sites will become divorced from their landscape context within a re-engineered open caste setting.

Beyond directly impacting the mines themselves, the effects that the proposal would also have on the integrity of the historic landscape at Denniston could potentially be significant if left unmitigated.

Table 6 to Table 8 set out the effects and proposed mitigation measures and additional initiatives at each of the three Project sub-areas on the Denniston Plateau.

Table 6. Summary of adverse effects of ESE on historic heritage, proposed mitigation / additional initiatives and overall effects after mitigation

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
Monocable Aerial Cableway (K29/59)	Removal of concrete foundation slabs for the towers at Features A2, A3, A4, and A5.	In accordance with a HHMP: Avoidance and protection of adjacent remains of this site where possible (i.e. locations included on disturbance [construction/mine] plans, barriers/fences around features in proximity to prevent inadvertent damage); Update recording of remains to be removed, including Structure recording to Level III in Heritage NZ's Guidelines. Artefact recording, collection and deposit if discovered. The Top Loading and Aerial Drive Station (Feature A1) at the Whareatea Mine is located immediately adjacent to the proposed ESE disturbance but will be protected and avoided. The associated Monocable Aerial Cableway foundations at Sullivans Mine (Features A12 – A14) will also be avoided.	Protection of remaining heritage features Recovery of historical information		Minor Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
Whareatea Mine (K29/72)	Destruction of the fines settling pond (Feature 20) and an area of 'coal'. The destruction of extensive underground mine workings at Whareatea. However, the extent of these workings occurred in relatively recent times, and they are well recorded and understood.	In accordance with a HHMP: Avoidance and protection of adjacent surface mining remains (i.e. locations included on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines), barriers/fences around features in proximity to prevent inadvertent damage). Adoption of Noise Assessment[5] recommendations based on guideline vibration limits for historic structures, including the shoring of structures to minimise vibration sensitivity. Prepare a works programme in consultation with DOC for the protection and maintenance of the Whareatea Mine site during the mining operations of the ESE; and on closure and rehabilitation of the mine to	Protection and conservation of remaining surface mining features Recovery of historical information Further historical research	Compensation funding for future Denniston historic enhancement work[6] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: - Ongoing management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal; - Historic management and developed public access to additional areas of the Denniston Plateau[7] e.g. areas within the Denniston settlement that highlight,	Moderate Adverse Effects

[5] Marshall Day Acoustics Nov 2025
[6] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.
[7] During the duration of the BCPCP project and on its completion

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
		reestablish public access with improved interpretation. Update recording of remains affected, including Structure recording to Level III in Heritage NZ's Guidelines. Commission further research of the Whareatea Mine, particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at Hocken Library. During the construction and operation of ESE the ability to access and view underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst staff/Contractors during construction and operation record and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact collection and deposit if discovered		preserve and interpret the social history of the plateau, such as the bowling green, bath house, dam and tennis court; - Oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area.	

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
Sullivan Mine (K29/98)	Destruction of four surface mining features associated with the Sullivan Mine – the closed-off shaft and concrete foundations of the Fan Drift (Feature 24); the foundation of the workshop/store; and other associated remains (Feature 32), which include the reservoir (Lake Cannew) (Feature 37), pump shed foundation (Feature 38) and a coal dump to the east of the main mine remains. There will be no effects on the main underground workings of the No. 1 South Sullivan mine.	In accordance with a HHMP: Avoidance and protection of adjacent surface remains (i.e. locations included on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines), barriers / fences around features in proximity). Adoption of Noise Assessment[8] recommendations based on guideline vibration limits for historic structures, including the shoring of structures to minimise vibration sensitivity. Update recording of remains affected, including Structure recording to Level II in Heritage NZ's Guidelines. Artefact collection and deposit if discovered. Commission further research of the Sullivan Mine, particularly oral history	Protection of remaining heritage features Recovery of historical information Further historic research	Compensation funding for future Denniston historic enhancement work[9] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: Cleaning up the Sullivan Mine site, conservation work on the winder (possibly the construction of a roof) and mine tubs, and development of track network to allow visitation during and after mining. Also, see above under Whareatea Mine	Moderate Adverse Effects

[8] Marshall Day Acoustics Nov 2005

[9] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
		and the examination of mining records in Archives New Zealand and Westport Coal Company material at Hocken Library.			
Power Poles	Removal of several power poles. Power poles on the very edge of disturbance areas may be damaged in the future, particularly during road maintenance.	In accordance with a HHMP: Avoid individual power poles outside of the disturbance and buffer of the ESE where possible. To minimise the possibility of damage during future road maintenance, those undertaking works should be instructed not to disturb the remaining power poles.	Protection / retention of remaining power poles	n/a	Minor Adverse Effects
Drill hole and building / Metal bolts	Removal of these isolated remains with no known history or context	In accordance with a HHMP: Update recording of remains affected.		n/a	Nil to Minor Adverse Effects
Effects on the historic setting of key historic heritage places	The destruction of surface mine remains and extensive underground mining remains at ESE will contribute to the cumulative effects of the ongoing loss of features	Avoidance and protection of adjacent surface remains at the Whareatea and Sullivan Mines and Monocable Aerial Cableway (i.e. locations included on disturbance [construction/mine] plans and within 'no-work' exclusion zones		Compensation funding for future Denniston historic	High Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
or heritage landscapes	associated with these sites and to their setting within the Denniston Plateau. The incremental loss of parts of the significant Denniston Plateau historic landscape by opencast ming and infrastructure, which is largely absent from the Denniston Plateau, will lead to an overall negative effect on the historic values on the Plateau and its historic setting. Sites within the ESE will become divorced from their landscape setting within a re-engineered setting due to surrounding open cast mining. Public access and education opportunities to this part of	(GPS fencing in machines), barriers / fences around features in proximity). Commission further research of the Sullivan Mine, particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at Hocken Library. Re-establishment of public access with improved interpretation at the Whareatea Mine in accordance with the works programme prepared in consultation with DoC for the protection and maintenance of the mine site.		enhancement work[10] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: - Ongoing management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal; - Historic management and developed public access to additional areas of the Denniston Plateau[11] e.g. areas within the Denniston settlement that highlight, preserve and interpret the social history of the plateau, such as the bowling green,	

[10] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.
[11] During the duration of the BCPCP project and on its completion

Site / Heritage Feature(s)	Nature of adverse effects	Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional recommended initiatives to address any shortfall in specific mitigation	Overall Effects (after mitigation and additional initiatives)
	the Denniston heritage landscape will be restricted during mining operations.			bath house, dam and tennis court; - Oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area.	

ESE General Mitigation of Heritage Effects

It is recommended that the following historic heritage mitigation measures are adopted and implemented by a HHMP for the ESE Project sub-area:

- Update recording of any heritage mining remains affected, including Structure recording to Levels II and III (as appropriate) in Heritage NZ's Guidelines.
- Protection measures should be put in place so that additional heritage mining remains/features associated with sites K29/59, K29/72 and K29/98 are not inadvertently impacted upon. For example, their locations should be marked on development plans and within 'no-work' exclusion zones (GPS fencing in machines), fencing/barriers installed around the sites in the vicinity of construction works.
- Adoption of Noise Assessment recommendations based on guideline vibration limits for historic structures, including the shoring of structures to minimise vibration sensitivity.
- Prepare a works programme in consultation with DOC for the protection and maintenance of the Whareatea Mine site during the mining operations of the ESE; and on closure and rehabilitation of the mine to reestablish public access with improved interpretation.
- During the construction and operation phase of ESE the ability to view and record underground workings is limited due to safety considerations. Notwithstanding this there may be opportunities for Bathurst staff/contractor[s] to photograph, record and retrieve items that might be useful for displays and interpretation as outlined in the HHMP.
- Commission further research of the Whareatea Mine and Sullivan Mine, particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at the Hocken Library;
- New recording and research results should be disseminated to Heritage New Zealand, DOC and Buller District Council (Cultural Heritage Inventory), as well as the public and deposited with local archives/heritage groups and organisations (e.g. Denniston Heritage Trust (DHT)).
- An archaeological Authority is being applied for under the Fast-track Approvals Act 2024 to cover the Iron Bridge Mining area (L29/98) and other areas of the UWHR – Southwestern section in close proximity of the late 19th century mining remains within the Heritage NZ Listed and TTPP scheduled – Denniston Historic Area (see Part 2. of the BPCP Archaeological and Historic Heritage Assessment). As a precaution the Authority area will include the proposed infrastructure area of the ESE where small surface workings for alluvial gold where noted on a 1915 plan south of Coalbrookdale in the vicinity of the V8 Creek.
- To address shortfalls in specific mitigation, additional initiatives are recommended for the effects on the Whareatea Mine, Sullivan Mine and the setting of the Denniston historic landscape, as follows:

1). Bathurst should fund agreed future Denniston historic enhancement work with DOC (and other interested parties if relevant) as per Table 6. Agreed enhancement work options could include:

- Ongoing management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal;

- Historic management and developed public access to additional areas of the Denniston Plateau e.g. areas within the Denniston settlement that highlight, preserve and interpret the social history of the plateau, such as the bowling green, bath house, dam and tennis court;

- Oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area.

Overall Effects of the ESE

There are no identified mining remains present within the ESE Project sub-area that date to a pre-1900 period. However, given the overall significance of the 20th century coal mining sites within this area of the BPCP, the proposed disturbance areas have been designed to avoid impacting directly on the vast majority of the mine surface features. Some of these areas remain within the overall Project footprint, but protection measures should be put in place so that they are not inadvertently impacted upon.

There is an excellent existing baseline survey and recording of surface heritage features within the ESE Project sub-area footprint as a result of past survey and research. Also, the extent of the underground mine workings occurred in relatively recent times and they are therefore, well recorded and understood.

The wealth of knowledge of the coal mining which remains on the Denniston Plateau because of extensive previous historic research, archaeological survey and assessment has allowed the BPCP to undertake an extended options assessment to avoid historic heritage sites where possible within the ESE footprint.

The ESE will affect some surface mining features associated with the Monocable Aerial Cableway (K29/59), Whareatea Mine (K29/72) and Sullivan Mine (K29/98), although the ESE has been purposely designed to avoid impacting directly on the majority of these remains. Bathurst have committed to avoid any surface mining remains within the wider consent area outside the proposed areas of disturbance. These areas will remain buffer areas where Bathurst does not intend to disturb.

The ESE will also affect extensive underground mine workings associated with the Whareatea Mine.

The destruction of a few surface mine remains and extensive underground mining remains does contribute to the cumulative effect of the ongoing loss of features associated with these sites and the Denniston historic landscape. An incremental loss of parts of the historic landscape will lead to an overall negative effect on the historic values on the Plateau.

The destruction of the remnants from relatively recent era coal mining on the Denniston Plateau may not seem significant in isolation as there are many mines dating from this period on the West Coast. However, when considered within the context of the broader

archaeological landscape on the Denniston Plateau, the loss of the historic remains of later periods of mining is significant. As noted above, the context values of the historic sites on Denniston are quite high as most of these sites remain.

The advent of opencast mining and the progressive reworking of underground mines through opencast methods at ESE, which is largely absent from the Denniston Plateau, will result in the loss of features associated with previous mine workings, will lead to an overall negative effect on the historic values of the Plateau and its historic setting. The remaining parts of the Whareatea and Sullivan Mines will become divorced from that aspect of the historic landscape and lose context. If left unmitigated this would be a significant effect. Therefore, additional initiatives have been proposed to address shortfalls in specific mitigation for the effects of the ESE on historic heritage sites and the setting of the Denniston historic landscape.

Conclusion

Overall, the effects of the proposed ESE Project sub-area on historic heritage sites after recommended mitigation and additional initiatives are likely to be moderate, while the effects remain high on the historic setting of key heritage places or heritage landscapes due to the nature of opencast mining.

.

Table 7. Summary of adverse effects of the UWHR on historic heritage, proposed mitigation and overall effects after mitigation

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
Iron Bridge Mine (L29/98)	A remnant of a possible collapsed rope road/flume already impacted on by road construction will be destroyed. A non-insitu return airway concrete pillar/foundation will be moved away from the UWHR alignment and possible associated sub-surface archaeological deposits will be destroyed. In places underground workings are known to be very shallow so may need to be purposefully collapsed, to avoid subsidence when the road is excavated and constructed.	As a precaution an Archaeological Authority is being applied for under the Fast-track Approvals Act process to cover the Iron Bridge Mining area. Archaeological monitoring, recording and investigation of any archaeological features associated with the mine that are affected within the Project area under a developed Archaeological Management Plan approved under the Authority. Move the return airway concrete pillar/foundation and associated timbers and metal rods to the south of/above the proposed construction footprint. During the construction of the UWHR the ability to access and view exposed underground workings is limited due to safety considerations. Notwithstanding this, where there may be opportunities for Bathurst staff/Contractors during construction to record and photograph exposed workings and features of interest and	Recovery of historical information Protection of remaining heritage features	n/a	Minor Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
		retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact recording, collection and deposit if discovered			
Beggs Outcrop (L29/99)	Construction of the UWHR on the southern side of Cedar Creek Road at Beggs Outcrop will destroy any subsurface remains of 1950s – early 1960s mining features.	In accordance with a HHMP: Avoidance and protection of adjacent surface mining remains on the northern side of the UWHR at Beggs Outcrop (i.e. location recorded on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines); place barriers/ fences around features in proximity to prevent inadvertent damage). Archaeological monitoring of earthworks along the southern side of the UWHR at Beggs Outcrop to record any subsurface remains of 1950s – early 1960s mining features. Artefact recording, collection and deposit if discovered	Protection of remaining heritage features Recovery of historical information	n/a	Nil to Minor Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
Cooks Lease Area (L29/102)	Removal of 1950s coal rubble / spoil heaps, coal outcrops and discarded metal remains	In accordance with a HHMP: Artefact recording, collection and deposit if discovered	Recovery of historical information	n/a	Nil to Minor Adverse Effects
Power Poles	Removal of several individual power poles Power poles on the very edge of the road may be damaged in the future, particularly during road maintenance.	In accordance with a HHMP: Avoid individual power poles in proximity to the UWHR if possible. Recording the entire power line and, if possible, establishing the source and destination of the power supply. In minimise the possibility of damage during future road maintenance, those undertaking works should be instructed not to disturb remaining power poles.	Protection / retention of remaining power poles Recovery of historical information	n/a	Nil to Minor Adverse Effects
Effects on the historic setting of key historic heritage places or heritage landscapes	The incremental loss of parts of the significant Denniston Plateau historic landscape by modern mining infrastructure, which is largely absent from the Denniston Plateau, will lead to an overall negative effect on the historic values on the Plateau and its historic setting.	Avoidance and protection of adjacent surface mining remains (i.e. location recorded on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines); place barriers/ fences around features in proximity to prevent inadvertent damage). Commission an engineering assessment of the structural integrity	Protection and conservation of remaining heritage features		Moderate Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
	Public access and education opportunities to this part of the Denniston heritage landscape will be restricted during construction and mining operations.	of the brick reclining chimney of the Kiwi Fan House and Compressor (L29/101) and options to stabilise if required. Where public access currently exists through to the Mackley Track, separated pedestrian/ cycle access will be provided for. On closure and rehabilitation of the mining operation to reestablish public access to this part of the Denniston heritage landscape.			

UWHR General Mitigation of Heritage Effects

It is recommended that the following historic heritage mitigation measures are adopted and implemented by a HHMP[12] for the UWHR Project sub-area:

- Since the proposal may impact on archaeological remains associated with the Iron Bridge Mine (L29/98), an Archaeological Authority is being applied for under the Fast-track Approvals Act process prior to the start of any works that could impact on pre-1900 subsurface remains. An Archaeological Management Plan (AMP) will be submitted with the Authority application that will provide procedures to be followed during archaeological investigation, recording and monitoring of earthworks and procedures for recording any pre-1900 archaeological evidence before it is modified or destroyed.
- It is also considered possible that unrecorded subsurface archaeological sites may be exposed and impacted on along other areas of the UWHR – Southwestern section given the proximity of the late 19th century mining remains within the Heritage NZ Listed and TTPP scheduled – Denniston Historic Area. Therefore, it is recommended that the Authority under the Fast-track Approvals Act also covers this area so that potential delays can be avoided should sites be exposed.
- Archaeological monitoring, investigation and recording of any archaeological remains affected and subsequently uncovered during earthworks for the proposed mining operations will be carried out.
- Protection measures should be put in place so that additional heritage mining remains/features associated with the Iron Bridge Mine (L29/98), Kiwi Mine (L29/101) and Beggs Outcrop (L29/99) (including power poles) are not inadvertently impacted upon. For example, their locations should be marked on development plans and temporary fencing installed around the sites in the vicinity of construction works.
- Commission an engineering assessment of the structural integrity of the brick reclining chimney of the Kiwi Fan House and Compressor (L29/101) and options to stabilise if required.
- Recording of any 20th century historic remains affected and uncovered during earthworks.
- New recording and research results should be disseminated to Heritage New Zealand, DOC and Buller District Council (Cultural Heritage Inventory), as well as the public and deposited with local archives/heritage groups and organisations (e.g. Denniston Heritage Trust (DHT)).

Overall Effects of the UWHR

The wealth of knowledge of the coal mining remains on the Denniston Plateau as a result of extensive previous historic research, archaeological survey and assessment has allowed the BPCP to undertake an extended options assessment to avoid historic heritage sites where possible within the UWHR footprint. The UWHR has been designed to avoid

[12] Except where an Archaeological Management Plan is in place under an Archaeological Authority.

impacting on all the heritage features and archaeological sites within the Heritage NZ Listed Area and TTPP scheduled – Denniston Historic Area, including the extensive and significant early settlement and coal mining remains at Burnetts Face and Coalbrookdale and the main surface remains of the Iron Bridge Mine (L29/98) and Kiwi Mine. The alternative option to upgrade the existing road network from the ESE through Denniston and Burnetts Face to Cedar Creek Road would have had significant effects on historic heritage values, and this option was dismissed as a result.

Those few heritage features which are impacted can be effectively mitigated through recording and the dissemination of research results.

Conclusion

Overall, the effects of the proposed UWHR on historic heritage after recommended mitigation are likely to be minor, while the effects remain moderate on the historic setting of key heritage places or heritage landscapes due to the expansion of modern mining infrastructure.

Table 8. Adverse effects of the MFS Project on historic heritage and proposed mitigation /additional initiatives and overall effects after mitigation

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation and additional initiatives)
Koranui Mine (L29/14)	Destruction of surface mine remains that date from the 1880s and include the ventilation (air) shaft and likely the main portal at the top of the horse tramway and connected to the tramway via a cutting; and possibly the tramway cutting/ embankment and associated artefacts. The destruction of extensive underground mine workings at Koranui that date from the late 19th century. It is highly likely that additional similar historic mining features associated	An Archaeological Authority is being applied for under the Fast Track Approvals Act process to cover the Koranui Mining area. Archaeological recording and investigation of archaeological features associated with L29/14 that are affected within the Project area under a developed Archaeological Management Plan approved under the Authority. During the construction and operation of MFS the ability to access and view underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst staff/Contractors during construction and operation record	Protection of remaining features Recovery of historical information	Compensation funding for future Denniston historic enhancement work[13] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: - Ongoing levels of management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal; - Historic management and public access to additional areas of the Denniston Plateau e.g. Koranui Incline.	Moderate Adverse Effects

[13] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation and additional initiatives)
	with the Koranui Mine, that have not been identified by field survey, will be located within and will be impacted by the proposed MFS project.	and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact recording, collection and deposit if discovered The Koranui Incline and associated features are located in close proximity to the MFS mining area and measures (i.e. locations included on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines), place barriers/fences around features in proximity to prevent inadvertent damage).			
Taipo Mine (L29/100)	Destruction of an extensive area of surface mining remains associated with Taipo Mine at the Top Brake Station and Kiel's Flat dating from the 1920s – 1940s.	In accordance with a HHMP: Avoid any remains where possible (i.e. locations included on disturbance [construction/mine] plans and within 'no-work' exclusion zones (GPS fencing in machines), place barriers/fences	Protection of the remaining features of the Deep Creek / Iron Bridge Mine	Further research of the Taipo Mine (and the associated Iron Bridge, Kiwi and Deep Creek Mines), particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at the Hocken Library.	Moderate Adverse Effects

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation and additional initiatives)
	The destruction of extensive underground mine workings at Taipo. However, the extent of these workings occurred in relatively recent times, and they are well recorded and understood. Destruction of part of the continuous haulage rope road, including the ropeway formation, tunnels and artefacts.	around features in proximity to prevent inadvertent damage). Pre-commencement survey and recording of surface heritage mining features, including Structure recording to Level II in Heritage NZ 2018 Guidelines. During the construction and operation of MFS the ability to access and view underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst staff/Contractors during construction and operation record and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP.	Recovery of historical information	Compensation funding for future Denniston historic enhancement work[14] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: - Ongoing levels of management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal; - Historic management and public access to additional areas of the Denniston Plateau[15] e.g. Iron Bridge Mine after the completion of BPCP.	

[14] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.
[15] During the duration of the BPCP and on its completion.

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation and additional initiatives)
		Artefact recording, collection and deposit.			
Effects on the historic setting of key historic heritage places or heritage landscapes	The destruction of an extensive area of mining remains and underground mining workings at MFS contributes to the cumulative effects of the ongoing loss of features associated with these sites and to their setting within the Denniston Plateau. An incremental loss of parts of the historic landscape by opencast mining and infrastructure, which is largely absent from the Denniston Plateau, will lead to an overall negative effect on the historic values on the			Compensation funding for future Denniston historic enhancement work[16] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: - Ongoing levels of management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal; - Funding for oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area	High Adverse Effects

[16] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation and additional initiatives)
	Plateau and its historic setting. Sites within the MFS will become divorced from their landscape setting within a re-engineered setting due to surrounding open cast mining.				

MFS General Mitigation of Heritage Effects

It is recommended that the following historic heritage mitigation measures are adopted and implemented by a HHMP for the MFS Project sub-area:

- Where the proposal will affect any archaeological remains at the Koranui Mine (L29/14), an Archaeological Authority is required as part of the Fast Track Approvals Act 2024 process prior to the start of any works that could impact on pre-1900 subsurface remains. An Archaeological Management Plan (AMP) will be submitted with the Authority application that will provide procedures to be followed during archaeological investigation, recording and monitoring of earthworks and procedures for recording any pre-1900 archaeological evidence before it is modified or destroyed under the Authority.
- During the construction and operation phase of MFS the ability to view and record underground workings is limited due to safety considerations. Notwithstanding this there may be opportunities for Bathurst staff/contractor[s] to photograph, record and retrieve items that might be useful for displays and interpretation as outlined in the HHMP.
- The heritage remains affected at Taipo Mine post-date 1900 and are therefore not archaeological sites as defined by sec 6 of the HNZPTA. However, pre-commencement survey and recording of surface heritage mining features is recommended, including Structure recording to Level II in the Heritage NZ 2018 Guidelines.
- Protection measures should be put in place so that additional heritage sites and features in proximity to proposed MFS works are not inadvertently impacted upon. For example, their locations should be marked on development plans, and within 'no-work' exclusion zones (GPS fencing in machines) and barriers/fencing installed around the features/sites in the vicinity of construction works.
- Further research should be commissioned of the Taipo Mine (and the associated Iron Bridge, Kiwi and Deep Creek Mines), particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at the Hocken Library, to increase the available knowledge of this mining area.
- New recording and research results should be disseminated to Heritage New Zealand, DOC and Buller District Council (Cultural Heritage Inventory), as well as the public and deposited with local archives/heritage groups and organisations (e.g. Denniston Heritage Trust (DHT)).
- To address shortfalls in specific site mitigation, additional initiatives are recommended for the effects on the Koranui Mine (L29/14) and Taipo Mine (L29/100) and the setting of the Denniston historic landscape, as follows:

  1) Bathurst should fund agreed future Denniston historic enhancement work with DOC (if applicable) and other interested parties as per Table 8. Agreed enhancement work options could include:

     - Ongoing management of high priority items identified in the Denniston Conservation Plan e.g. re-establishing public access to the Banbury Mine portal;

- Historic management and public access to additional areas of the Denniston Plateau, e.g. Koranui Incline and Iron Bridge Mine remains after the completion of BPCP;

- Further research of the Taipo Mine (and the associated Iron Bridge, Kiwi and Deep Creek Mines), particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at the Hocken Library;

-Funding for oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area.

Overall Effects of the MFS

MFS will destroy an extensive area of surface mining remains and underground mining workings associated with the Taipo Mine (L29/100) that dates from the 1920s to the 1940s. It will also destroy some 1880s surface mining features and underground mine workings at the Koranui Mine (L29/14). The MFS will avoid impacting on the Koranui Incline.

The destruction of surface mine remains and extensive underground mining remains contributes to the cumulative effect of the ongoing loss of features associated with these sites and on the Denniston historic landscape. An incremental loss of parts of the historic landscape will lead to an overall negative effect on the historic values on the Plateau.

The destruction of the remnants from relatively recent era coal mining on the Denniston Plateau may not seem significant in isolation as there are many mines dating from this period on the West Coast. However, when considered within the context of the broader archaeological landscape on the Denniston Plateau, the loss of the historic remains of later periods of mining is significant. As noted above the context values of the historic sites on Denniston are quite high as most of these sites remain.

The advent of opencast mining and the progressive reworking of underground mines through opencast methods at MFS, which is largely absent from the Denniston Plateau, will result in the loss of features associated with previous mine workings and lead to an overall negative effect on the historic values on the Plateau and its historic setting. The remaining parts of the Koranui and Iron Bridge, Kiwi and Deep Creek Mines will become divorced from that aspect of the historic landscape and lose context. If left unmitigated this would be a significant effect. Therefore, additional initiatives have been recommended to address shortfalls in specific mitigation for the effects of the MFS on historic heritage sites and the setting of the Denniston historic landscape.

Conclusion

Overall, the effects of the proposed MFS Project sub-area on historic heritage sites after recommended mitigation and additional initiatives are likely to be moderate, while the effects on the historic setting of key heritage places or heritage landscapes remain high due to the nature of opencast mining.

Stockton Plateau

Table 9 sets out the effects and proposed mitigation measures and additional initiatives at the Stockton Plateau.

Table 9. Adverse effects of the Stockton Project sub-area on historic heritage and proposed mitigation /additional initiatives and overall effects after mitigation

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
Electric Loco Line (L28/20)	Destruction of approximately 125m of the 1908 underground evidence of the 'B' Tunnel of the Electric Loco Line. The destruction of early 20th century underground mine workings associated with the 'B' Tunnel Mine.	In accordance with a HHMP: Avoidance and protection of the remaining sections of the Loco Line (i.e. marked on disturbance [construction/mining] plans and within 'no-work' exclusion zones (GPS fencing in machines), barriers/fences around features) in proximity to modern Stockton Mining activities to prevent inadvertent damage. During the construction and operation of Stockton the ability to access and enter the 'B' Tunnel and underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst	Protection of remaining heritage features Recovery of historical information	Compensation funding for future Denniston historic enhancement work[17] agreed with DOC (and other interested parties if relevant). Agreed enhancement work options could include: Supporting the development and maintenance of an additional heritage recreation opportunity offsite. Reestablishing public access from the west to historic mining and milling sites at Charming Creek.	Moderate Adverse Effects

[17] Similar to compensation provided in 2014 following the granting of resource consent to Bathurst and an Access Arrangement with DOC allowing the company to expand mining activities on the Denniston Plateau. Compensation projects chosen for funding and agreed to in a Compensation Deed of the access arrangement. The sites chosen at that time for historic enhancement utilising the compensation fund were Conns Creek, Coalbrookdale and Burnett's Face.

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
		staff/Contractors during construction and operation record and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact recording, collection and deposit if discovered			
Mine Creek Settlement and Infrastructure site (L28/17)	Existing planned disturbance (as at 1 April 2027) under current resource consent will destroy approximately the southern half of the Mine Creek site, as provided by the 2009 Archaeological Authority (No. 2009/327), including the power house complex (boiler house, air compressor shed and fan house with brick ventilation flue), the Magazine and associated terrace, tramway embankments, coal face, Fletcher's Drive mine	An Archaeological Authority (re-application) is being applied for under the Fast Track process for existing planned disturbance (as at 1 April 2027) under current resource consent and planned disturbance (following 1 April 2027) as part of the BPCP to cover the Mine Creek Settlement. In accordance with a HHMP: Avoidance and protection of the remaining features of Mine Creek outside areas of proposed disturbance (i.e. marked on disturbance	Protection of remaining heritage features Recovery of historical information	The completion of any outstanding investigation, research and analysis as part of the archaeological work required under condition of archaeological Authority No 2009/327. The completion of the outstanding Final Authority report on archaeological work required under condition of archaeological Authority No 2009/327, including one article detailing an aspect of the results of the investigation prepared to a professional standard of publication. The custodianship of artefacts recovered during archaeological work at Mine Creek Settlement and Infrastructure site (L28/17) will be finalised in consultation with	Minor Adverse Effects (given that most effects have previously been mitigated)

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
	entrance, remains of a concrete dam and part of a track. Destruction of other possible unrecorded subsurface archaeological remains associated with Mine Creek within an additional area of planned disturbance (following 1 April 2027). The destruction of underground mine workings associated with the Mine Creek East Mine that date from the late 19th century.	[construction/mining] plans and within 'no-work' exclusion zones (GPS fencing in machines), barriers/fences around features) in proximity to modern Stockton Mining activities to prevent inadvertent damage. During the construction and operation of Stockton the ability to access and view underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst staff/Contractors during construction and operation record and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact recording, collection and deposit.		Bathurst, the Northern Buller Museum Granity (items from Stockton) and Kawatiri Westport Museum (where appropriate).	

Site / Heritage Feature(s)	Nature of adverse effects	Proposed Specific Mitigation Measures	Objective(s) of mitigation and link to effects (loss mitigating)	Additional initiatives recommended to address any shortfall in mitigation	Overall Effects (after mitigation)
Jorgen's Drive (L28/16)	Destruction of approximately half (350m) of the 1925 Jorgen's Tramway Drive.	In accordance with a HHMP: Pre-commencement recording of Jorgen's Drive, including Structure recording to Level III in Heritage NZ 2018 Guidelines.	Recovery of historical information	n/a	Minor Adverse Effects
3rd West Extended Mine (1922 – 1934)	Destruction of 20th century underground mine workings	In accordance with a HHMP: During the construction and operation of Stockton the ability to access and view underground workings is limited due to safety considerations. Notwithstanding this, where there will be opportunities for Bathurst staff/Contractors during construction and operation record and photograph exposed workings and features of interest and retrieve items that might be useful for displays and interpretation by the methods outlined in the HHMP. Artefact recording, collection and deposit.	Recovery of historical information	n/a	Minor Adverse Effects

Stockton General Mitigation of Heritage Effects

It is recommended that the following historic heritage mitigation measures are adopted and implemented by a HHMP for the Stockton Project sub-area:

- Where the proposal will affect any archaeological remains at the Mine Creek Settlement (L28/17) and underground mine workings associated with the Mine Creek (East) Mine, an Archaeological Authority is required as part of the Fast Track Approval process prior to the start of any works that could impact on pre-1900 subsurface remains. An Archaeological Management Plan (AMP) will be submitted with the Authority application that will provide procedures to be followed during archaeological investigation, recording and monitoring of earthworks and procedures for recording any pre-1900 archaeological evidence before it is modified or destroyed under the Authority.
- The completion of any outstanding investigation, research, analysis and final reporting as part of the archaeological work previously required under condition of archaeological Authority No 2009/327. Including one article detailing an aspect of the results of the investigation prepared to a professional standard of publication.
- During the construction and operation phase of Stockton the ability to view and record underground workings is limited due to safety considerations. This includes the Electric Loco Line (L28/20) 'B' Tunnel. Notwithstanding this there may be opportunities for Bathurst staff/contractor[s] to photograph, record and retrieve items that might be useful for displays and interpretation as outlined in the HHMP.
- Where heritage remains of the Jorgen's Drive (L28/16) are affected that post-date 1900 and are therefore not an archaeological site as defined by section 6 of the HNZPTA, pre-commencement survey and recording of heritage features is recommended, including Structure Recording to Level III in the Heritage NZ 2018 Guidelines.
- Avoidance and protection measures should be put in place so that the remaining sections of the Loco Line and the heritage features at Mine Creek Settlement outside of proposed disturbance areas but in proximity to proposed Stockton works are not inadvertently impacted upon (i.e. marked on mining plans and within 'no-work' exclusion zones (GPS fencing in machines), barriers/fences installed around features.
- Adoption of Noise Assessment recommendations based on guideline vibration limits for historic structures. This included the adjacent section of the 'B' Tunnel outside the area of proposed disturbance.
- New recording and research results should be disseminated to Heritage NZ, DOC and Buller District Council (Cultural Heritage Inventory), as well as the public and deposited with local archives/heritage groups and organisations (e.g. Millerton and Plateau Protection Society Incorporated (MAPPS)).
- To address shortfalls in specific site mitigation, additional initiatives are recommended, as follows:

    1) Bathurst should fund agreed future Stockton historic enhancement work with DOC (if relevant) and other interested parties as per Table 9. Agreed enhancement work could include:

- Supporting the development and maintenance of an additional heritage recreation opportunity offsite. Reestablishing public access from the west to historic mining and milling sites at Charming Creek.
- The completion of any outstanding investigation, research and analysis as part of the archaeological work required under condition of archaeological Authority No 2009/327 at Mine Creek Settlement (L28/17).
- The completion of the outstanding Final Authority report on archaeological work required under condition of archaeological Authority No 2009/327 at Mine Creek Settlement (L28/17), including one article detailing an aspect of the results of the investigation prepared to a professional standard of publication.
- The custodianship of artefacts recovered during archaeological work at Mine Creek Settlement (L28/17) will be finalised in consultation with Bathurst, the Northern Buller Museum Granity (items from Stockton) and Kawatiri Westport Museum (where appropriate).

Overall Effects of Stockton

The Stockton Project sub-area will destroy an approximately 125m long section of the 'B' Tunnel of the 1908 Electric Loco Line (L29/20). The Electric Loco Line was constructed after 1900 and is thus not protected by the archaeological provisions of the HNZPTA. It is, however, listed in the BDP Schedule of Historic Buildings and Sites (L28/109, coal tramway), therefore, resource consent is required to impact on this site.

Over time, the Loco Line formation has been damaged in different places, typically by work on the haul road and particularly on the original 1908 section. At this stage, approximately 80% of the line remains in situ, with four major cuts in it. Destroying part of the B' Tunnel (approximately 125m) would contribute to the cumulative effect of the ongoing loss of sections of the Electric Loco Line, which is a site of high heritage value.

The Stockton Project sub-area will also destroy approximately the southern half of the Mine Creek Settlement and Infrastructure site, as previously provided by the 2009 Archaeological Authority (No. 2009/327). The recorded features within this area of disturbance include the power house complex consisting of the boiler house, air compressor shed and fan house (brick ventilation flue), [redacted], tramway embankments, coal face, Fletcher's Drive mine entrance, remains of a concrete dam, part of a track and possibly unrecorded associated subsurface archaeological remains associated with the Mine Creek site. It will also destroy underground mine workings associated with the Mine Creek East Mine that date from the late 19th century.

Mine Creek Settlement (L29/17) has been previously modified under NZHPT Authority 2009/327 for destruction by opencast mining resulting in the prior archaeological investigation of several of heritage features at this site. The Mine Creek Settlement is also listed in the BDP Schedule of Historic Buildings and Sites (Schedule 14.1 – L28/106) and resource consent is therefore required to impact on this site.

The Stockton Project sub-area will also destroy approximately half of the c.1925 Jorgen's Tramway Drive (L28/16). This site is listed in the BDP Schedule of Historic Buildings and Sites (L28/105), therefore, resource consent is required to impact on this site.

Areas of underground workings associated with 20th century mines – 'B' Tunnel Mine and 3rd West Extended Mine, will also be destroyed by the Stockton project sub-area. This will have no more than minor adverse effects as the heritage significance of these is limited.

The progressive reworking of underground mines through opencast methods at Stockton has already had a significant effect on earlier mining sites. There is an excellent existing baseline survey and recording of surface heritage features within the Stockton footprint as a result of past survey and research. Also, the extent of the underground mine workings occurred in relatively recent times and they are, therefore, well recorded and understood.

Conclusion

Overall, the effects on historic heritage after recommended mitigation and additional compensation initiatives are likely to be minor – moderate adverse effects.

Pest Free Enclosure Fences

Four long-lasting pest free enclosure fences are proposed on various parts of the Denniston and Stockton Plateaux as part of the BPCP Project. Of the four proposed fences two are located on the Denniston Plateau – North Denniston and Coalbrookdale, and two on the Stockton Plateau – Mt Augustus and Whirlwind Rise.

The proposed pest free enclosure fences on the Denniston and Stockton Plateaux will have no known adverse effects on archaeological or other historic heritage remains. However, the Denniston Coalbrookdale fence crosses the alignment of the Heritage NZ Listed Area and Tai o Poutini Plan (TTPP) Heritage Schedule – Denniston Historic Area, in two places. The proposed alignment has been designed to avoid impacting on all recorded archaeological sites within this area, which are associated with the Coalbrookdale Mine (1884 -) and 'Village of Coalbrookdale' (1891-1956). However, it has the potential to impact on unidentified subsurface archaeological remains given the proximity of the late 19th century mining and settlement remains within the Denniston Historic Area.

Denniston Pest Free Enclosures General Mitigation of Heritage Effects

It is recommended that the following historic heritage mitigation measures are adopted and implemented by a HHMP for the Denniston Pest Free Enclosures:

- As a precaution a general Archaeological Authority will be applied for to cover the UWHR – Southwestern section and eastern extent of the Denniston Coalbrookdale pest free enclosure fence prior to any works. The conditions should include archaeological monitoring, recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project area, and any other archaeological remains uncovered during earthworks.
- Recorded archaeological sites L29/32, L29/34 and L29/35 (historic house terraces) within the Denniston Historic Area should be identified on the ground by a qualified archaeologist and temporarily fenced off prior to fence construction of the Denniston Coalbrookdale pest free enclosure fence.
- Feature A26, A27 and A29 of the Monocable Aerial Cableway (K29/59) should be identified on the ground and temporarily fenced off prior to fence construction of the North Denniston pest free enclosure fence in these areas.

Conclusion

Overall, the effects on historic heritage after recommended mitigation are likely to be minor adverse effects.

STATUTORY AND POLICY FRAMEWORK

Fast-track Approvals Act 2024

Under Section 42(4)(a) an application may seek a resource consent that would otherwise be applied for under the Resource Management Act 1991. In accordance with clause 17, Schedule 5 of the Fast-track Approvals Act 2024, sections 5, 6 and 7 of Part 2 of the RMA must be considered.

As well, the application may seek under Section 42 subsection (4) (i) an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 that would otherwise be applied for under that Act.

Resource Management Act 1991

Section 6 of the RMA identifies the following as matters of national importance: 'the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga' (S6(e)); and 'the protection of historic heritage from inappropriate subdivision, use, and development' (S6(f)).

All persons exercising functions and powers under the RMA are required under Section 6 to recognise and provide for these matters of national importance when 'managing the use, development and protection of natural and physical resources'. There is a duty to avoid, remedy, or mitigate any adverse effects on the environment arising from an activity (S17), including on historic heritage.

Historic heritage is defined (S2) as 'those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities: (i) archaeological; (ii) architectural; (iii) cultural; (iv) historic; (v) scientific; (vi) technological'. Historic heritage includes: '(i) historic sites, structures, places, and areas; (ii) archaeological sites; (iii) sites of significance to Maori, including wahi tapu; (iv) surroundings associated with the natural and physical resources.

Regional, district and local plans contain sections that help to identify, protect and manage archaeological and other heritage sites. The plans are prepared under the rules of the RMA. The West Coast Regional Policy Statement (Jul 2020) and Buller District Plan (Operative Jan 2000, Amended Sep 2011) are relevant to the proposed activity.

Te Tai o Poutini Plan (TTPP) is the proposed combined Buller, Grey and Westland District Council Plan that will replace the current individual district plans in 2027. The TTPP Decisions Version (Decision Plan) was publicly notified on 10 October 2025. The Historic Heritage Rules in the proposed TTPP (Jul 2022) had immediate legal effect.

Summary of Historic Heritage Requirements under the RMA

This assessment has established that the BPCP will affect four scheduled items in the Buller District Plan Schedule 14.1 Historic Places – Electric Loco Line (L28/109); Koranui Mine (L29/122); Mine Creek Settlement (L28/106); and Jorgen's Drive (L28/105). Resource consent is required as these sites will be affected by the proposal.

The proposed alignment of the UWHR and Denniston Coalbrookdale pest free enclosure fence will cross within the Te Tai o Poutini Plan (TTPP) Heritage Schedule One: Historic Heritage Items and Areas, and Schedule 1B: Archaeological Sites – Denniston Historic

Area (HH5 and ARCH5). Resource consent will be required to impact on the Denniston Historic Area. However, the four scheduled items on the BDP are not included in the TTPP.

However, the proposed alignment has been designed to avoid impacting on all archaeological and other historic heritage sites or features within the scheduled area, including the extensive and significant early settlement and coal mining remains at Burnett's Face and Coalbrookdale, and the surface remains of the Iron Bridge Mine (L29/98) and Kiwi Mine.

This assessment has established that the BPCP will or may affect three pre-1900 archaeological sites – Iron Bridge Mine (L29/98), Koranui Mine (L29/14) and the Mine Creek Settlement (L28/17). In all Project sub-areas of the BPCP there are also mining remains present that are post-1900.

Any consent granted should include a condition requiring the Consent Holder to undertake all activities in accordance with the Historic Heritage Management Plans (HHMPs) for each of the Project sub-areas. The purpose of the HHMP to:

- Document and describe the strategy, objectives and actions that Bathurst propose to mitigate adverse effects on historic heritage during the pre-mining, mining and post -mining phases of each of the Project sub-areas;
- Document and describe the strategy, objectives and actions that Bathurst propose to provide additional historic heritage compensation measures to address any shortfall in specific mitigation measures for adverse effects on historic heritage within the Project sub-areas;
- Demonstrate compliance with the conditions on the Project sub-areas in statutory approvals.

Any consent granted should include accidental discovery protocols, as a condition of consent in areas that are not subject to an archaeological Authority.

It is also recommended that an advice note regarding the provisions of the HNZPTA is included, as an Authority under that Act will be required for any modification and investigation of archaeological remains.

Heritage New Zealand Pouhere Taonga Act 2014 Requirements

The HNZPTA protects all archaeological sites whether recorded or not, and they may not be damaged or destroyed unless an Authority to modify an archaeological site has been issued by Heritage NZ (Section 42).

An archaeological site is defined by the HNZPTA Section 6 as follows:

> '**archaeological site** means, subject to section 42(3), –
>
> (a) any place in New Zealand, including any building or structure (or part of a building or structure) that –
>
> (i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and
>
> (ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and

(b) includes a site for which a declaration is made under section 43(1).

Under Section 42(3) an Authority is not required to permit work on a pre-1900 building unless the building is to be demolished.

Under Section 43(1) a place post-dating 1900 (including the site of a wreck that occurred after 1900) that could provide 'significant evidence relating to the historical and cultural heritage of New Zealand' can be declared by Heritage NZ to be an archaeological site.

Authorities to modify archaeological sites can be applied for either in respect to archaeological sites within a specified area of land (Section 44(a)), or to modify a specific archaeological site where the effects will be no more than minor (Section 44(b)), or for the purpose of conducting a scientific investigation (Section 44(c)). Applications that relate to sites of Māori interest require consultation with (and in the case of scientific investigations the consent of) the appropriate iwi or hapū and are subject to the recommendations of the Māori Heritage Council of Heritage NZ. In addition, an application may be made to carry out an exploratory investigation of any site or locality under Section 56, to confirm the presence, extent and nature of a site or suspected site.

Under Section 52 of the Act, Heritage NZ may impose an Authority condition requiring that an archaeological investigation is carried out, if this is 'likely to provide significant information in relation to the historical and cultural heritage of New Zealand'. This provision allows the information contained within a site affected by development (and any associated artefacts) to be recorded and preserved, in mitigation of the modification of the site.

Under Section 65 of the Act, Heritage NZ has the power to list significant historic places and areas, wāhi tupuna, wāhi tapu and wāhi tapu areas on the New Zealand Heritage List/Rārangi Kōrero. The purpose of listing is to inform members of the public and landowners about the values of significant places and to assist in their protection under the RMA. Heritage NZ would be considered an affected party in relation to any consent application affecting an item on the List.

Summary of Historic Heritage Requirements under the HNZPTA

The UWHR Project sub-area and Denniston Coalbrookdale pest free enclosure fence will cross within the Heritage NZ Listed Area – Denniston Heritage Area, a Category I historic place (NZ Heritage List No. 7049). Therefore, Heritage NZ is an affected party in relation to any consent application affecting this item on the List.

However, the proposed alignment has been designed to avoid impacting on all archaeological and other historic heritage sites or features within the Listed area, including the extensive and significant early settlement and coal mining remains at Burnett's Face and Coalbrookdale, and the surface remains of the Iron Bridge Mine (L29/98) and Kiwi Mine.

The BPCP will or has the potential to affect three pre-1900 recorded archaeological sites – Iron Bridge Mine (L29/98), Koranui Mine (L29/14) and the Mine Creek Settlement (L28/17). It is also considered possible that unrecorded subsurface archaeological sites may be exposed and impacted on along the UWHR – Southwestern section and part of the Denniston Coalbrookdale pest free enclosure fence, given the close proximity of the late 19th century mining and settlement remains within the Denniston Historic Area. Therefore, an Authority is being applied for to carry out work that may affect these sites and other so far unidentified, subsurface or near surface features that could be exposed.

The conditions of the Authority are proposed to include the archaeological recording/investigation of any remains affected.

There are currently no known archaeological sites of Māori origin recorded within the BPCP that will be affected. However, the absence of evidence is not necessarily evidence of absence. Particularly, as much of the historic mining evidence and disturbance is associated with underground mining on the Denniston Plateau.

In all Project sub-areas of the BPCP there are mining remains present that are post-1900. Accordingly, there is no statutory requirement for Bathurst to apply for an Archaeological Authority before commencing construction and mining in these areas. In the unlikely event that surface and underground mining remains that pre-date 1900 are uncovered in areas where only 20th century remains have been recorded, Bathurst acknowledges that it would require an Authority to destroy, damage or modify an archaeological site. Such an authority would be sought from Heritage NZ at that time.

Conservation Act 1987

Where BPCP Project sub-areas are located on conservation land, the Conservation Act is also relevant for this project. In addition to other consents, the Project will require a concession application to the Department of Conservation (DOC) or alternative arrangement.

The values of historic heritage sites on conservation land need to be assessed to establish their significance and what the appropriate management strategy is, given that level of significance, irrespective of whether they have archaeological restrictions under the HNZPTA.

Under the Conservation Act 1987, DOC's role in relation to cultural heritage is to manage such heritage and advocate for its conservation. In the Act, conservation is defined as 'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.' A historic resource is defined as 'a historic place within the meaning of the Heritage New Zealand Pouhere Taonga Act 2014.' The HNZPTA defines a historic place as follows:

(a) means any of the following that forms a part of the historical and cultural heritage of New Zealand and that lies within the territorial limits of New Zealand:
    (i) land, including an archaeological site or part of an archaeological site;
    (ii) a building or structure (or part of a building or structure);
    (iii) any combination of land, buildings, structures, or associated buildings or structures (or parts of buildings, structures, or associated buildings or structures); and
(b) includes anything that is in or fixed to land described in paragraph (a)

Of note is that this definition is not the same as that for archaeological sites and does not relate to the date at which a historic place was formed, used or abandoned.

Conservation General Policy

DOC's Conservation General Policy provides further guidance on the management and protection of historic heritage (DOC 2019). The following policies are of particular relevance:

> 5(b) Historical and cultural heritage on public conservation lands and waters, that is assessed as having high significance in accordance with the Historic Places Act 1993 , should be actively managed (including restoration where this is necessary) within the context of integrated conservation management.
>
> 5(d) Significant information should be recorded where historical and cultural heritage on public conservation lands and waters is threatened by unavoidable damage or destruction.
>
> 5(e) Historic buildings and structures on public conservation lands and waters should be used in ways that:
>
> i. enable their preservation;
>
> ii. are in keeping with their assessed significance;
>
> iii. and provide opportunities for the public to appreciate them.

West Coast Conservation Management Strategy

The West Coast Conservation Management Strategy outlines specific policies and plans for the management of heritage within the West Coast Conservancy, including the management of historic heritage. Section 3.4.2.1 outlines how historic heritage is to be protected and the mechanisms for doing this. This section notes that 'management is based on the principle that historical and cultural heritage located within public conservation lands should be protected from unauthorised uses.' Protection of the historic heritage must be considered in a number of specific situations, including when granting concessions and other authorisations.

Policy for Government Management of Cultural Heritage Places

The 2022 Policy for Government Management of Cultural Heritage Places (effective 1 Feb 2023) by the Ministry for Culture and Heritage (Manatū Taonga) directs state sector agencies, including DOC, to identify, protect, and manage heritage sites in their care. Replacing the 2004 policy, it ensures heritage values are considered in property management, aligns with mātauranga Māori, and mandates compliance reporting to Manatū Taonga.

Under Guidance Policy 2: Meet legislative requirements and heritage conservation standards, for all planning and work on heritage places, government agencies will comply with:

- relevant statutory and regulatory requirements, such as requirements for resource consents under Part 6 of the Resource Management Act 1991, archaeological authorities under the Heritage New Zealand Pouhere Taonga Act 2014 and Treaty Settlement deeds and legislation;

- accepted conservation standards, such as the ICOMOS New Zealand Charter 2010 and TICCIH (The International Committee for the Conservation of the Industrial Heritage).

The ICOMOS New Zealand Charter (revised 2010) (Te Pūmanawa o ICOMOS o Aotearoa hei Tiaki i ngā Taonga Whenua Heke Iho o Nehe) for the Conservation of Places of Cultural Heritage Value

ICOMOS (the International Council on Monuments and Sites) is an international non-governmental organisation of heritage professionals engaged in the conservation of places of cultural heritage value and dedicated to the conservation of the world's historic monuments and sites. The New Zealand committee (ICOMOS New Zealand / Te Mana o Ngā Pouwhenua o Te Ao) administers the ICOMOS New Zealand Charter 2010 for the Conservation of Places of Cultural Heritage Value (the ICOMOS New Zealand Charter), a set of principles which guides conservation practice.

The ICOMOS New Zealand Charter is widely used and is a recognised benchmark for conservation standards and practice. It is used by DOC, HNZPT and many Local Authorities, and underpins the Policy.

TICCIH (The International Committee for the Conservation of the Industrial Heritage)

TICCIH is the advisory body for industrial heritage. In 2003 TICCIH adopted the Nizhny Tagil Charter for the Industrial Heritage, and this is the international document for the management and conservation for industrial heritage. The Charter provides definitions of industrial heritage, sites, and landscapes, and provides maintenance and conservation philosophies.

CONCLUSIONS

Escarpment Extended (ESE)

- The proposed ESE Project sub-area encompasses part of the 20th century workings of the Whareatea Mine (K29/72) and the Sullivan Mine (K29/98), which includes above ground mining remains and the extensive surviving underground workings.
- The proposed ESE pit and associated infrastructure have been designed to avoid impacting directly on the majority of the surface features at the Whareatea Mine, and will affect only four surface features associated with the Sullivan Mine. It will destroy extensive underground mine workings associated with the Whareatea Mine; however, the extent of these underground mines has occurred in relatively recent times and is well recorded and understood.
- The proposed ESE Project sub-area will remove a small number of concrete foundations associated with the Monocable Aerial Cableway (K29/59) towers built in 1950-1953 to carry coal from the Whareatea, Escarpment and Sullivan Mines to the brakehead bins at Denniston. Remains of the aerial system are scattered over a 3.68km aerial route across the Denniston Plateau.
- The proposed ESE pit will remove a drill hole, and possible building remains and metal bolts west of the Sullivan Mine site. These remains have no known history or context but are undoubtably associated with 20th century activity on this area of the Denniston Plateau.
- The proposed upgrade of the Whareatea Road and the ESE pit northeast of Whareatea Mine will likely remove approximately nine power poles, which are remnants of a power line that had provided power to either the Whareatea or (the original) Escarpment Mine.
- It is also likely that other unrecorded 20th century heritage features and/or sites may be present within the ESE project area under vegetation or buried by soil and/or coal.
- There are no mining remains present within the ESE Project sub-area that date to a pre-1900 period. However, as a precaution an archaeological Authority is being applied for under the Fast-track Approvals Act 2024 and will include the proposed infrastructure area of the ESE where small surface workings for alluvial gold where noted on a 1915 plan south of Coalbrookdale in the vicinity of the V8 Creek.
- The proposed opencast mining and reworking of underground mines by the ESE, which has largely not previously occurred on the Denniston Plateau, will result in the cumulative loss of some 20th century mining features within the context of the significant archaeological landscape on the Denniston Plateau. This will lead to an overall negative effect on the historic values on the Plateau and its historic setting.
- Public access and education opportunities to this part of the Denniston heritage landscape will be restricted during mining operations.

Overall, the effects of the proposed ESE Project sub-area on historic heritage sites after recommended mitigation and additional initiatives are likely to be moderate, while the effects the historic setting of key heritage places or heritage landscapes remain high due to the nature of opencast mining.

Upper Waimangaroa Haul Road (UWHR)

- The UWHR Project sub-area will cross within the very southern extent of the Heritage NZ Listed Area – Denniston Heritage Area, a Category I historic place (NZ Heritage List No. 7049). Therefore, Heritage NZ is an affected party in relation to any consent application affecting this item on the List. However, the proposed alignment has been designed to avoid impacting on all archaeological and other historic heritage sites or features within this area, including the extensive and significant early settlement and coal mining remains at Burnett's Face and Coalbrookdale, and the surface remains of the Iron Bridge Mine (L29/98) and Kiwi Mine (L29/101).
- The proposed alignment of the UWHR does cross the very southern extent of the Te Tai o Poutini Plan (TTPP) Heritage Schedule – Denniston Historic Area (HH5 and ARCH5); therefore, resource consent is required to impact on this area.
- The proposed UWHR crosses an area of extensive underground mine workings associated with the Iron Bridge Mine (L29/98). The workings of Iron Bridge Mine south of the Waimangaroa River to the haul road date from 1887- 1945. While the UWHR across this area is primarily located within an already modified road corridor in places the Iron Bridge Mine underground workings are known to very shallow so these may need to be purposefully collapsed, to avoid subsidence when the road is excavated and constructed.
- The proposed UWHR – Eastern section will impact on remains of a Return Airway (concrete pillar) that are not in-situ, and these remains could be moved south and uphill out of the construction corridor. However, there may be other in situ subsurface archaeological deposits in this area that were associated with the Return Airway site.
- Part of a possible rope road/flume alignment may be impacted upon where it intersects with the existing road alignment, but this is an unconfirmed feature and consists of a track cutting. Some discarded metal remains of unknown origin will also be impacted but these remains could be moved north outside the construction corridor.
- As a precaution an archaeological Authority is being applied for under the Fast-track Approvals Act 2024 to cover the Iron Bridge Mining area (L29/98) and other areas of the UWHR – Southwestern section in close proximity of the late 19th century mining remains within the Heritage NZ Listed and TTPP scheduled – Denniston Historic Area. Archaeological monitoring, recording and investigation of any archaeological features associated with this site that are affected within the Project area will be carried out under a developed Archaeological Management Plan.
- During the construction and operation of UWHR the ability to access and enter historic underground workings is limited due to safety considerations. Notwithstanding this, there may be opportunities for Bathurst staff to photograph workings of interest (where structural remains, graffiti, etc are present) and retrieve items from the historic workings that might be useful for displays and interpretation.

- Construction of the UWHR on the southern side of Cedar Creek Road at Beggs Outcrop (L29/99) and the Cooks Lease Area (L29/102) will likely impact on subsurface remains of 1950s to early 1960s mining features. The majority of the surface mining remains at Beggs Outcrop will be avoided.

Overall, the effects of the proposed UWHR on historic heritage after recommended mitigation are likely to be minor, while the effects remain moderate on the historic setting of key heritage places or heritage landscapes due to the expansion of modern mining infrastructure.

Mount Frederick South (MFS)

- The MFS Project sub-area will destroy historic underground workings and numerous mine drives and tunnels, the ventilation (air) shaft, the main portal and possibly the tramway cutting/embankment and artefacts associated with the Koranui Mine (L29/14) dating from the 1880s. It is highly likely that additional historic mining features associated with the Koranui Mine, that have not been identified by field survey, will be located within and will be impacted by the proposed MFS project.
- An archaeological Authority is being applied for under the Fast-track Approvals Act 2024 process to cover the Koranui Mining area. Archaeological monitoring, recording and investigation of archaeological features associated with L29/14 affected within the Project area will be carried out under a developed Archaeological Management Plan. The Koranui Mine is also listed in the Buller District Plan Schedule of Historic Buildings and Sites (Schedule 14.1 – L29/122) and resource consent is therefore required to impact this site.
- The MFS Project sub-area will also destroy an extensive area of surface mining remains and underground workings associated with the Taipo Mine (L29/100) dating from the 1920s to 1940s. This mine was worked and accessed as an extension of mining and a rope-haulage system associated with the Deep Creek and Kiwi workings of the Iron Bridge Mine.
- The proposed opencast mining and reworking of underground mines by the MFS, which has largely not previously occurred on the Denniston Plateau, will result in the cumulative loss of both 19th and 20th century mining features within the context of the significant archaeological landscape on the Denniston Plateau. This will lead to an overall negative effect on the historic values on the Plateau and its historic setting.
- Public access to this part of the Denniston heritage landscape will be restricted during mining operations.

Overall, the effects of the proposed MFS Project sub-area on historic heritage sites after recommended mitigation and additional initiatives are likely to be moderate, while the effects on the historic setting of key heritage places or heritage landscapes remain high due to the nature of opencast mining.

Stockton

- The proposed Stockton Project sub-area will remove part (approximately 125m) of the underground remains of the 1908 'B' Tunnel of the Electric Loco Line (L28/20) and destroy early 20th century underground mine workings associated with the 'B' Tunnel Mine.
- The Electric Loco Line was constructed after 1900. Accordingly, there is no statutory requirement for Bathurst to apply for an archaeological Authority under the HNZPTA before commencing construction and mining. It is, however, listed in the Buller District Plan Schedule of Historic Buildings and Sites (No. 109, coal tramway); therefore, resource consent is required to impact on this site.
- The proposed Stockton Project sub-area will destroy approximately half of the Mine Creek Settlement and Infrastructure site (L28/17), including the remains of the power house complex, and other possible unrecorded subsurface archaeological remains, and destroy underground mine workings associated with the Mine Creek East Mine that date from the late 19th century.
- In 2009 an Authority (No. 2009/327) was granted by Heritage NZ to Solid Energy Ltd to destroy the remains of the historic Mine Creek infrastructure and settlement site by opencast mining with conditions requiring archaeological recording, investigation, sampling, analysis and reporting. Some of these condition requirements are still outstanding. As Authority No 2009/327 has expired an archaeological Authority is being re-applied for under the Fast-track Approvals Act 2024 process to cover the Mine Creek Settlement and Infrastructure site (L28/17) and any pre-1900 underground mine workings associated with the Mine Creek (East) Mine for existing planned disturbance (as at 1 April 2027) under current resource consent and planned disturbance (following 1 April 2027) as part of the BPCP Stockton Project sub-area.
- The Mine Creek Settlement is also listed in the Buller District Plan Schedule of Historic Buildings and Sites (Schedule 14.1 – L28/106) and resource consent is therefore required to impact on this site.
- The proposed Stockton Project sub-area will destroy approximately half (350m) of the 1925 Jorgen's Drive (L28/16). This is also listed in the Buller District Plan Schedule of Historic Buildings and Sites (Schedule 14.1 – L28/105), requiring resource consent before it can be modified.
- The proposed Stockton Project sub-area will destroy 20th century underground mine workings at the 3rd West Extended Mine (1922 – 1934).

Overall, the effects on historic heritage after recommended mitigation are likely to be minor – moderate in relation to the proposed Stockton Project sub-area.

Pest Free Enclosure Fences

- Remnants of the Monocable Aerial Cableway (K29/59) are located within proximity to the proposed Denniston North Enclosure alignment in two places where the fence intercepts the previous cableway alignment. Typically, these remnants (A26 – A30) comprise of concrete tower foundations and associated metal remains.

- The proposed alignment of the Denniston Coalbrookdale fence will cross the Heritage NZ Listed Area – Denniston Historic Area and Te Tai o Poutini Plan (TTPP) Heritage Schedule One: Historic Heritage Items and Areas and Archaeological Sites – Denniston Historic Area (HH5), in two places. However, the proposed alignment has been designed to avoid impacting on all recorded archaeological sites within this area, which are associated with the Coalbrookdale Mine (1884 -) and 'Village of Coalbrookdale' (1891-1956).
- It is considered possible that unrecorded subsurface archaeological sites may be exposed and impacted on along areas of the Denniston Coalbrookdale pest free enclosure fence, given the proximity of the late 19th century mining remains within the Heritage NZ Listed and TTPP scheduled – Denniston Historic Area. As a precaution a general Archaeological Authority will be applied for to cover these areas. The conditions should include archaeological monitoring, recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project area, and any other archaeological remains uncovered during earthworks.

RECOMMENDATIONS

General Recommendations

- Bathurst should adopt the proposed mitigation measures and additional initiatives for the mitigation of effects on archaeological and historic heritage values as a result of the BPCP Project sub-areas (Table 6 – Table 9).
- Any consent granted should include a condition requiring the Consent Holder to undertake all activities in accordance with the Historic Heritage Management Plan (HHMP). The purpose of the HHMP being to:
  - Document and describe the strategy, objectives and actions that Bathurst propose to mitigate adverse effects on historic heritage during the pre-mining, mining and post-mining phases of each of the Project sub-areas;
  - Document and describe the strategy, objectives and actions that Bathurst propose to provide additional historic heritage compensation measures to address any shortfall in specific mitigation measures for adverse effects on historic heritage within the Project sub-areas;
  - Demonstrate compliance with the conditions on the Project sub-areas in statutory approvals.
- Any consent granted should, as a condition of resource consent, include accidental discovery protocols and an advice note advising Bathurst of their obligations under the Heritage New Zealand Pouhere Taonga Act 2014 with regards to archaeology. The protocols would apply to areas not covered by the Archaeological Authority.
- Since the proposal will or may affect recorded archaeological sites an Archaeological Authority must be in place prior to the start of any works at these sites and within particular areas (*Note that this is a legal requirement*).
- Detailed recommendations for archaeological investigation and recording should be set out in the Archaeological Management Plans (AMPs) that will accompany the applications for Authorities to modify archaeological sites. For practical implementation any AMP will be incorporated into the relevant HHMP.
- Any archaeological remains exposed during Project works should be archaeologically investigated and recorded in accordance with the conditions of the Archaeological Authority, and the construction management plan should allow sufficient time for the investigation and recording of any remains that may be exposed.
- In the event of kōiwi tangata (human remains) being uncovered, work should cease immediately in the vicinity of the remains and tangata whenua, Heritage NZ, the NZ Police and Buller District Council should be contacted so that appropriate arrangements can be made.
- New recording and research results should be disseminated to Heritage NZ, DOC and Buller District Council (Cultural Heritage Inventory), as well as the public and deposited with local archives/heritage groups and organisations (e.g. Denniston Heritage Trust, Friends of the Hill).

ESE

- No resource consents will be required for historic heritage as no scheduled historic heritage items are affected by the proposed ESE Project sub-area.
- Protection measures should be put in place so that identified archaeological remains/features associated with the Whareatea Mine (K29/72), Sullivan Mine (K29/98), and Monocable Aerial Cableway (K29/59), are not inadvertently impacted upon. These should include having their locations marked on project plans and within 'no-work' exclusion zones (GPS fencing in machines), and installing barriers / fencing around the sites/features during construction and mining work.
- As a precaution an archaeological Authority is being applied for under the Fast-track Approvals Act 2024 and will include the proposed infrastructure area of the ESE where small surface workings for alluvial gold were noted on a 1915 plan south of Coalbrookdale in the vicinity of the V8 Creek.

UWHR

- The UWHR Project sub-area will cross within the very southern extent of the Heritage NZ Listed Area – Denniston Heritage Area, a Category I historic place (NZ Heritage List No. 7049). Therefore, Heritage NZ is an affected party in relation to any consent application affecting this item on the List.
- The proposed alignment of the UWHR crosses the southern extent of the Te Tai o Poutini Plan (TTPP) Heritage Schedule One: Historic Heritage Items and Areas and Schedule 1B: Archaeological Sites – Denniston Historic Area (HH5 and ARCH5); therefore, resource consent is required to impact on this area.
- As a precaution a general Archaeological Authority under the Fast-track Approvals Act 2024 process will be applied for to cover the UWHR – Southwestern section, and the Iron Bridge Mining area (L29/98) within the UWHR – Eastern section prior to any works. The conditions should include archaeological monitoring, recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project area, and any other archaeological remains uncovered during earthworks.
- Protection measures should be put in place so that additional heritage mining remains/features associated with the Iron Bridge Mine (L29/98), Kiwi Mine (L29/101) and Beggs Outcrop (L29/99) (including power poles) are not inadvertently impacted upon. These should include having their locations marked on project plans and installing temporary barriers / fencing around the sites/features in the vicinity of construction works.

MFS

- Resource consent is required to impact on a scheduled item in the BDP (Schedule 14.1 Historic Places) – Koranui Mine and Incline (L29/14) Ref No. L29/122.

- An Archaeological Authority is required before any work associated with proposed MFS can be carried out that may affect the site L29/14 Koranui Mine (*Note that this is a legal requirement*). The conditions could include archaeological recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project sub-area, and any other archaeological remains uncovered during earthworks.
- The heritage remains affected at Taipo Mine (L29/100) post-date 1900 and are therefore not archaeological sites as defined by sec 6 of the HNZPTA. However, pre-commencement survey and recording of surface heritage mining features is recommended, including Structure Recording to Level II in the Heritage NZ 2018 Guidelines.
- Protection measures should be put in place so that additional heritage sites in proximity to proposed MFS works are not inadvertently impacted upon elsewhere. These should include having their locations marked on project plans and within 'no-work' exclusion zones (GPS fencing in machines), and installing temporary barriers / fencing around the sites/features in the vicinity of construction and mining works.

Stockton

- Resource consent is required to modify scheduled items in the BDP (Schedule 14.1 Historic Places) - Stockton Electric Tramway (Loco Line) (L29/20) Ref No. L29/109; Mine Creek Settlement (L29/17) Ref No. L29/106; and Jorgen's Drive (L28/16) Ref No. L28/105.
- An Archaeological Authority (re-application) is applied for under the Fast-track Approvals Act 2024 process to cover the Mine Creek Settlement site (L28/17). (*Note that this is a legal requirement*). The conditions should include archaeological monitoring, recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project sub-area, and any other archaeological remains uncovered during earthworks.
- Heritage remains of the Jorgen's Drive (L29/16) post-date 1900 and are therefore not an archaeological site as defined by sec 6 of the Heritage New Zealand Pouhere Taonga Act 2014. However, pre-commencement survey and recording of heritage features is recommended, including Structure recording to Level III in the Heritage NZ 2018 Guidelines.
- Protection measures should be put in place so that the remaining sections of the Electric Loco Line (L29/20) and heritage features at Mine Creek Settlement (L29/17) in proximity to proposed Stockton works are not inadvertently impacted upon. For example, their locations marked on development plans and 'no-work' exclusion zones (GPS fencing in machines), and barriers/fencing installed around the features/sites in the vicinity of construction works.

Pest Free Enclosure Fences

- The Denniston Coalbrookdale pest free enclosure fence will cross within the very southern extent of the Heritage NZ Listed Area – Denniston Historic Area, a

Category I historic place (NZ Heritage List No. 7049). Therefore, Heritage NZ is an affected party in relation to any consent application affecting this item on the List.

- The proposed alignment of the Denniston Coalbrookdale pest free enclosure fence crosses the Te Tai o Poutini Plan (TTPP) Heritage Schedule One: Historic Heritage Items and Areas and Archaeological Sites – Denniston Historic Area (HH5) in two places; therefore, the Historic Heritage Rules of the TTPP will apply.
- As a precaution a general Archaeological Authority under the Fast-track Approvals Act 2024 process will be applied for to cover the UWHR – Southwestern section and eastern extent of the Denniston Coalbrookdale pest free enclosure fence prior to any works. The conditions should include archaeological monitoring, recording and investigation of any archaeological features and remains associated with this site that may be affected within the Project area, and any other archaeological remains uncovered during earthworks.
- Recorded archaeological sites L29/32, L29/34 and L29/35 within the Denniston Historic Area should be identified on the ground by a qualified archaeologist and temporarily fenced off prior to fence construction of the Denniston Coalbrookdale pest free enclosure fence to prevent being impacted upon.
- Features A26, A27 and A29 of the Monocable Aerial Cableway (K29/59) should be identified on the ground and temporarily fenced off prior to fence construction of the North Denniston pest free enclosure fence in these areas to prevent being impacted upon.
- If unidentified archaeological sites or heritage features be identified during the fence build, a modified route should be selected with archaeological advice if possible to avoid these sites and/or features.

BIBLIOGRAPHY

Breen, J. Oct 2010. L & M Mining Application Archaeological Assessment – Escarpment Mine MP 51279. Internal Advice to DOC, DOCDM-618466.

Harris, G. 2008. Stockton Electric Railway: A Brief History for the Centenary. Unpublished report.

Heritage NZ. 2019. Writing Archaeological Assessments. Archaeological Guidelines Series No. 2.

The ICOMOS New Zealand Charter 2010 (Te Pūmanawa o ICOMOS o Aotearoa hei Tiaki i ngā Taonga Whenua Heke Iho o Nehe)

Marshall Day Acoustics Nov. 2025. Buller Coal Plateau Continuation Project: Assessment of Noise Effects – Rp001 R02 20240962. Prepared for Bathurst Resources Ltd.

Te Rūnanga o Ngāti Waewae 2026. Cultural Impact Assessment: Buller Plateaux Continuation Project. Fast Track Approvals Application. Prepared for Bathurst Resources Ltd.

Tumahai, F. Jul 2010. Cultural Impact Assessment of Escarpment Mine Project. With input from the whanau of Te Runanga o Ngati Waewae.

Watson, K. 2007. Mine Creek Settlement, Stockton Plateau: An Archaeological Assessment. Unpublished report for Solid Energy Ltd.

Watson, K. 2008. Department of Conservation Visitor Facilities Upgrade, Denniston: An Archaeological Assessment. Unpublished report for the Department of Conservation, Westland Conservancy.

Watson, K. Apr 2009. Escarpment Mine Project: An Archaeological Assessment. Unpublished report for L & M Coal Ltd.

Watson, K. Aug 2010. Escarpment Mine Project – Historic Heritage Values Assessment: Addendum 2. Unpublished report for L & M Coal Ltd.

Watson, K. June 2010. Escarpment Mine Project Archaeological Assessment Addendum. Unpublished report for L & M Coal Ltd.

Watson, K. May 2012. Buller Coal Ltd Haul Road Proposal: An Archaeological Assessment. Unpublished report for Buller Coal Ltd.

Watson, K. May 2023. Millerton North Water Infrastructure Project: An Archaeological Assessment. Unpublished report for BT Mining Ltd.

Watson, K. and L. Wright. May 2004. Whareatea, Sullivan and Sullivan West Mines, Denniston Coalfield. Archaeological Assessment for Solid Energy New Zealand Ltd.